## EPA Reg. No. 42750-174 Vol. 1

## MATERIAL TO BE ADDED TO JACKET

-	R	EG#	427	50-	176	
Des	crip	tion:				
	che	ck all tha	t apply			
		new st	amped ac	cepted	labe	el
	4	new C	SF			
		notifica	ition			
nding mat aper the SF fold	nis shee erial in naterial en hold <u>er</u> (if re	t to the top of jackets). This in the e-jacket together with turning jacket	ALL material sent sheet will be imaged. Remove staples a binder or paper of or covered with a d to file room shou	ed; a clear of from all ma slip. CSFs s red CBI she	description terial. If should be bet (if ret	returning loose e placed in the turning loose
eviewer Nam	r's e:	Tob: Col.	vin-Snyde		Date:	3-23-09 RD
Phone	ь.	703-30	5-7801	Di	vision:	RD



#### U.S. ENVIRONMENTAL PROTECTION **AGENCY**

Office of Pesticide Programs Registration Division (7505P) **Ariel Rios Building** 1200 Pennsylvania Ave., NW Washington, D.C. 20460

		7
EPA	Reg.	Number:

42750-174

Date of Issuance:

OCT 2008

NOTICE OF PESTICIDE:

x Registration Reregistration (under FIFRA, as amended) Term of Issuance: Conditional

Name of Pesticide Product:

TRICLOPYR BEE TECHNICAL

Name and Address of Registrant (include ZIP Code):

Mr. Morris Gaskins

Albaugh Inc.

P.O. Box 2127

Valdosta, GA 31604

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
  - 2. Submit the data listed below:
    - a. Submit data for explodability (Guideline 830.6316), one year storage stability (830.6317), corrosion characteristics (830.6320), and dissociation constant (830.7370) studies upon completion. You may request waivers for these studies with proper scientific justifications. The one year storage stability study and corrosion characteristics studies must be conducted with TRICLOPYR BEE TECHNICAL under full GLP requirements. It is recommended that the observations be made at intervals of 0 (initial), 3 month, 6 month, 9 month, and 12 month intervals.
  - 3. Make the following label changes:
    - a. Change the registration number to "42750-174".

Date:
10-8-08
10 0

page 2 EPA Reg. No. 42750-174

b. Remove the "]" (bracket) in "oxy]acetic" in the ingredient statement.

Submit one copy of the revised final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

If you have any questions about this notice, you may contact Tobi Colvin-Snyder at 703-305-7801 or Colvin-Snyder. Tobi @epa.gov.

Jim Toropkills Product Manager 25 Herbicide Branch

Registration Division (7505P)

#### TRICLOPYR BEE TECHNICAL

#### For Manufacturing Use Only

**ACTIVE INGREDIENT:** 

\*Acid Equivalent: triclopyr - 70.4%

#### CAUTION

#### FIRST AID

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatment information.

#### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, or using tobacco.

EPA Reg. No. 42750-RTU

EPA Est. No. xxxxxx-xxx

**NET CONTENTS:** 

MANUFACTURED FOR: Albaugh, Inc. Ankeny, IA 50021

ACCEPTED
with COMMENTS
In EPA Letter Dated

OCT 8 2008

Under the Federal Insecticide, Fundicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

#### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 32°F or agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by the state and local authorities.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

demil

# MATERIAL TO BE ADDED TO JACKET

	R	EG#	4275	0-1	146	RTU)
Des	crip	tion:	Administ	rative	Mark	erials
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		new sta	amped ac	cepted	labe	
		new CS	SF			
		notifica	tion			
new mate inding no paper the CSF foldopaper).	nis shee erial in naterial en hold ler (if re Material	t to the top of jackets). This in the e-jacket together with turning jacket) to be returned	sheet will be image. Remove staples a binder or paper or covered with a d to file room shou	jed; a clear from all ma clip. CSFs red CBI sh Ild be place	description descri	returning loose e placed in the urning loose propriate bin.
Reviewe Nam	rs ie:	Tobi Col	in-Snyde		Date: _	11-28-08 RD
Phon	e:	703-30.	5-7801	D	ivision: _	RD_

#### **CORPORATE OFFICE**

1525 NE 36th Street Ankeny, IA 50021 515.964.9444 - Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile



FED-X

Valdosta Office
P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office

229.244.5841 - Facsimile

475171-00

August 18, 2008

Document Processing Desk (APPLY)
Mr. Jim Tompkins (PM 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE:

Triclopyr BEE Technical EPA File Symbol 42750-RTU

Dear Mr. Tompkins,

The enclosed submission is additional 830-A product chemistry data being submitted for the above referenced registration in response to our discussion with Dr. Shyam Mathur of TRB last Friday. In addition to the additional 830-B Phys/Chem data (submitted on 8/13/08), Dr. Mathur requested additional details on the manufacturing process and potential carryover impurities. Accordingly we are submitting an addendum to the original product chemistry that provides additional details regarding the manufacturing process and formation of impurities.

This investigation led us to the conclusion that the original CSF should be corrected to allow for miscellaneous impurities due to potential carryover solvents and alcohols due to incomplete reactions as would be expected under normal manufacturing conditions. Accordingly we are also enclosing a proposed new basic CSF.

The following documents are enclosed:

- 8570-1 Application form
- Basic CSF (2 copies)

47517101°

Series 830-A Product Chemistry Addendum - Description of Production Process, Discussion of Formation of Impurities, and Certified Limits (OPPTS Guidelines 830.1620, 830.1670, and 830.1750) (3 copies)

Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc.



# Administrative Materials

	_
No.	form.
794	rorm.

MB No. 2070-0060. Approval expires 2-28-95



Registration
Amendment
Other

OPP Identifier Number

United State  Environmental Protect		ncy	✓	Registratio Amendme	
Washington, DC	_	•		Other	
Applica	ition for F	Pesticide	- Section		
1. Company/Product Number 42750-RTU		2. EPA Prod J. Tompki	uct Manager NS		3. Proposed Classification  ✓ None Restricted
4. Company/Product (Name) Triclopyr BEE Technical		PM# 23			✓ None Restricted
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127  Check if this is a new address		(b)(i), my p to:	No	ilar or identical	with FIFRA Section 3(c)(3) in composition and labeling
	Sec	tion - II			
Amendment - Explain below.  Resubmission in response to Agency letter dated  Notification - Explain below.  Explanation: Use additional pege(s) if necessary. (For second		Ag "M	ency letter dat le Too" Applic ner - Explein be	ation. alow.	of Impunities.
Material This Product Will Be Packaged In:	Sect	ion - III			
Child-Resistent Packaging  Yes  ✓ No  Value of the packaging of the packa		Soluble Packa Yes No	ging	Pie	tainer etal astic ass
* Certification must be submitted If "Yes" No. per contained	or Peckag		No. per conteiner	1 —	per ther (Specify)
✓ Lebel Container	Reteil Contain		1	Cation of Label D	irections ached to container
6. Manner in Which Label is Affixed to Product  Lit Pa St	hograph per glued enciled		Other		
	Secti	on - IV			
1. Contact Point (Complete items directly below for identific	<u>-</u>	duel to be cor	ntacted, if nec		
Name Morris Gaskins	Title Registrat	tions Manage	er		phone No. (Include Area Code)
Certify that the stetements I have made on this form I acknowledge that any knowlingly false or misleading both under applicable law.	ication and all attachr statement ma	ments thereto by be punisha	are true, accubie by fine or	urate and completing imprisonment of	6. Date Application \$\frac{1}{2}\text{Stamped}\$  (\$\text{Stamped}\$)
2. Signature  Mond Ald	3. Title Registrati	ons Manager			••••
4. Typed Name  Morris Gaskins	5. Date	August	t 19, 2008		



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

August 28, 2008

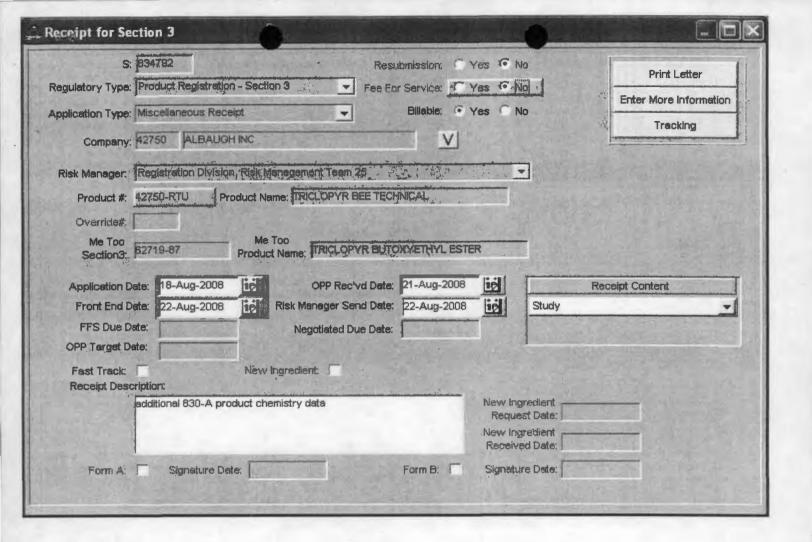
OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

ALBAUGH INC
PO Box 2127
VALDOSTA, GA 31604-2127

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 21-AUG-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



#### CORPORATE OFFICE

1525 NE 36th Street Ankeny, IA 50021 515.964.9444 - Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile



FED-X

Valdosta Office

P.O. Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

475171-00

August 18, 2008

Document Processing Desk (APPLY)
Mr. Jim Tompkins (PM 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE:

Triclopyr BEE Technical EPA File Symbol 42750-RTU

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47517101\*

Series 830-A Product Chemistry Addendum - Description of Production Process, Discussion of Formation of Impurities, and Certified Limits (OPPTS Guidelines 830.1620, 830.1670, and 830.1750) (3 copies)

Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc.





## **Memorandum**

Date: <u>08/2 /38</u>
To:, Regulatory Manager
From: Information Services Branch, ITRMD
Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.
We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.
If you have any questions about this process, please contact Teresa Downs (305-5363).
This is a: fully accepted submission partially accepted submission



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

August 21, 2008

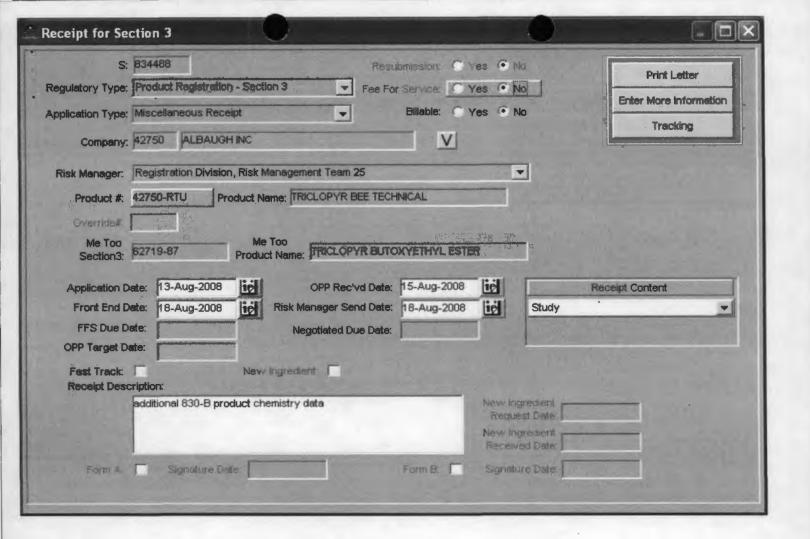
OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

ALBAUGH INC PO Box 2127 VALDOSTA, GA 31604-2127

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 15-AUG-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



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P.O. Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

475111-00

August 13, 2008

Document Processing Desk (APPLY)
Mr. Jim Tompkins (PM 25)
Registration Division
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

RE:

Triclopyr BEE Technical EPA File Symbol 42750-RTU

Dear Mr. Tompkins,

The enclosed submission is additional 830-B product chemistry data being submitted for the above referenced registration in response to our discussion with Dr. Mathur of TRB last Friday. Dr. Mathur requested data for several 830-B Phys/Chem guidelines not included with the initial application along with additional detail on the manufacturing process and impurity formation. We will submit that report later next week after obtaining additional process information from the producing facility.

The following documents are enclosed:

- 8570-1 Application form
- 8570-35 Data Matrix (internal)
- 8570-35 Data Matrix (public)

**47511101** Series 830-B Physical/Chemical Characteristics (OPPTS Guidelines 830.6314, 830.6315, & 830.7100) (3 copies) **47511102** Series 830-B Physical and Chemical Characteristics (OPPTS Guideline 830.7950) (3 copies)

The enclosed Data Matrix footnotes contain waiver requests for the following 830-B guidelines:

- 830.6316 Explodability. Triclopyr BEE Tech is not composed of any explosive components.
- 830.6319 Miscibility. Triclopyr BEE Techn is not intended to be diluted with oil or other non-polar solvents.
- 830.6321 Dielectric breakdown voltage. Triclopyr BEE Tech is not intended for use around electrical equipment.

Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc.



#### **CORPORATE OFFICE**

1525 NE 36th Street Ankeny, IA 50021 515.964.9444 - Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile



FED-X

Valdosta Office

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475111-00

August 13, 2008

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Mr. Jim Tompkins (PM 25)
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Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc.



# Administrative Materials

### **United States**

1	Registration
	Amendment
	Othor

Form Approved

OPP Identifier Number

MB No. 2070-0060. Approvel expires 2-28-95

<b>\$EPA</b>	Environmenta Wash	I Protectio			Amendme Other	ent	
		Applicatio	n for Pesticio	le - Section	1		
1. Company/Product Number 42750-RTU	)f		2. EPA F J. Tom	roduct Manager pkins		3. Proposed	Classification
4. Company/Product (Name Triclopyr BEE Technic			PM# 23			V None	Hestileted
5. Name and Address of Ap Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604		ode)	(b)(i), m to: EPA R		nilar or identica	I in composit	Section 3(c)(3) tion and labeling
			Section - II				
Notification - Explein	ponse to Agency letter			Final printed labe Agency letter da "Me Too" Applic Other - Explain b	ted eation.		
Explanation: Use addition Submission of additional 830					ewer Shyam Math	ur	
1. Material This Product Wil	I Re Deaksred las		Section - II				
Child-Resistant Packaging  Yes  No  Certification must be submitted	Unit Packaging  Yes  No  If "Yes" Unit Packaging wgt	No. per container	Water Soluble Pa  Yes  No  If "Yes"  Package wgt	No. per container		nteiner Vetal Yastic Glass Paper Other (Specify)	
3. Location of Net Contents	Information Container	4. Size(s) Reta	il Container bulk	5. Le	ocation of Label  On label at	Directions tached to conf	tainer
6. Manner in Which Label is	Affixed to Product	Lithogra Paper g Stencile		Other			
			Section - IV				
1. Contact Point (Complete	items directly below	for identification	of individual to be	contacted, if ned	cessery, to proce	ss this applica	tion.)
Name Morris Gaskins			Title Registrations Man	ager		lephone No. (In 29-244-3288	nclude Area Code)
I certify that the state I acknowledge that an both under applicable	y knowlingly false or		all attachments the			Ree	e Application eived (Stamped)
2. Signature	100/00	1	, Title Registrations Manag	ger	•		•
4. Typed Name	- eense o	5	. Date				••••
Morris Gaskins			Aug	ust 13, 2008			••••

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

	DAT	A MATRIX			
Date: 8/13/08			EPA Reg. No./File Symt	ol 42750-RTU	Page 1 of 5
Applicant's/Registrant's N	Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		Product TRICLOPY	R BEE TECHNICAL	2.0
Ingredient: Triclopyr but	oxyethyl ester (BEE) CAS # 64700-56-7				
<b>Guideline Reference</b>	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	473837-01	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	473837-01	Albaugh	OWN	
830.1620	Description of Production Process	473837-01	Albaugh	OWN	
830.1650	Description of Formulation Process				Waiver <sup>2</sup>
830.1670	Description of Formation of Impurities	473837-01	Albaugh	OWN	
830.1700	Preliminary Analysis	473837-02	Albaugh	OWN	
830.1750	Certified Limits	473837-01	Albaugh	OWN	
830.1800	Enforcement Analytical Method	473837-01	Albaugh	OWN	
830.6302	Color	473837-03	Albaugh	OWN	
830.6303	Physical State	473837-03	Albaugh	OWN	
830.6304	Odor	473837-03	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	473837-03	Albaugh	OWN	
830.6314	Qxidation/Reduction: Chemical Incompatibility	With submission	Albaugh	OWN	
830.6315	Hammability	With submission	Albaugh	OWN	
830.6316	Explodability				Waiver <sup>3</sup>
830.6317	Storage Stability				Not req'd1
Signature	Majors		Name and Title: Morris Regist	Gaskins rations Manager	Date: 8/13/08

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only paper version.

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIY

Date: 8/13/08			EPA Reg. No./File Symbol 4	2750-RTU	Page 2 of 5	
	Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021  Ient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.6319	Miscibility				Waiver <sup>4</sup>	
830.6320	Corrosion Characteristics				Not req'd1	
830.6321	Dielectric Breakdown Voltage				Waiver <sup>5</sup>	
830.7000	pH	473837-03	Albaugh	OWN		
830.7050	UV/Visible Absorption	473837-03	Albaugh	OWN		
830.7100	Viscosity	With submission	Albaugh	OWN		
830.7200	Melting Point/Melting Range				Waiver <sup>6</sup>	
830.7220	Boiling Point/Boiling Range	473837-03	Albaugh	OWN		
830.7300	Density/Relative Density/Bulk Density	473837-03	Albaugh	OWN		
830.7370	Dissociation Constants in Water	150.00			Not req'd1	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	473837-03	Albaugh	OWN		
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method			-2004 	Waiver <sup>7</sup>	
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Waiver <sup>7</sup> /	
Signature		N S	Name and Title: Morris Gask Registration		Date: 8/13/08	

EPA Form 8570-35 (9.97) Electronic and Paper versions available. Submit only paper version.

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DATA MATRIY

	DAI	A MATRIX			
Date: 8/13/08			EPA Reg. No./File Symbol 42750	-RTU	Page 3 of
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021		Product: TRICLOPYR BEE TECHNICAL			
	yl ester (BEE) CAS # 64700-56-7				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	473837-03	Albaugh	OWN	
830.7860	Water Solubility, Generator Column Method				Waiver <sup>8</sup>
830.7950	Vapor Pressure	With submission	Albaugh	OWN	
870.1100	Acute Oral Toxicity – Rat	CITE ALL		PAY	
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY	
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY	
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY	
870.2500	Primary Dermal Irritation	CITE ALL		PAY	
870.2600	Dermal Sensitization	CITE ALL		PAY	
Signature		Apr.	Name and Title: Morris Gaskins Registrations Mana	ager	Date: 8/13/08
	<ul> <li>and Paper versions available. Submit only paper versions</li> </ul>	ion.	Agency Internal Us	е Сору	

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DATA MATRIX

Date: 8/13/08			EPA Reg. No./File Symbol 42750-RTU		Page 4 of 5
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021  Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7		Product: TRICLOPYR BEE TECHNICAL			
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr generic data requir	-				
Albaugh will make offers-to-pay	to the following companies that appear on th	e current data submi	tters list for Triclopyr Butoxyethyl Ester.		
Triclopyr BEE data	Cite-All	i	Nufarm Americas (228)	PAY	
Triclopyr BEE data	Cite-All		Lebanon Seaboard (961)	PAY	
Triclopyr BEE data	Cite-All		BASF Sparks (51036)	PAY	
Triclopyr BEE data	Cite-All		Dow Agroscience (62719)	PAY	
Triclopyr BEE data	Cite-All		SDTF (66607)	PAY	
Triclopyr BEE data	Cite-All		Repar Corp (69361)	PAY	
Triclopyr BEE data	Cite-All		United Phosphorous (70506)	PAY	
Triclopyr BEE data	Cite-All		ORETF (71754)	PAY	
Triclopyr BEE data	Cite-All		Ag Re-Entry Task Force (71755)	PAY	
Triclopyr BEE data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr BEE data:	Cite-All		Endangered Species TF (73989)	PAY	
Triclopyr BEE data	Cite-All		Residential Exposure JV (74888)	PAY	
Triclopyr BEE data	Cite-All		AHETF (75234)	PAY	
	•				
Signature		M	Name and Title: Morris Gaskins Registrations Manage	er	Date: 8/13/08

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#### Footnotes for Triclopyr BEE Technical Data Matrix Page 5 of 5

#### Footnote 1

- 830.6317 Storage Stability.
- 830.6320 Corrosion characteristics
- 830.7370 Dissociation Constant

This data is not required for Technical Grade or MUP products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

#### Footnote 2

 830.1650 Formulation Process. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not deliberately formulated. See Guideline 830.1620

#### Footnote 3

- 830.6316 Explodability Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not composed of any explosive components.

#### Footnote 4

- 830.6319 Miscibility. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not intended to be diluted with oil or other non-polar solvents.

#### Footnote 5

830.6321 Dielectric breakdown voltage. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not labeled or intended for use around electrical equipment.

#### Footnote 6

830,7200 Melting Point. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical product is not a solid product.

#### Footnote 7

- 830.7560 Partition Coefficient, Generator Column Method
- 830,7570 Partition Coefficient, Liquid Chromatography Method

Albaugh requests a waiver for these data requirements. Albaugh elected to use Guideline 830.7550 to satisfy this data requirement.

#### Footnote 8

- 830.7860 Water Solubility, Generator Column Method. Albaugh requests a waiver for this data requirement. Albaugh elected to use Guideline 830.7840 to satisfy this data requirement.



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		DAT	A MATRIX			
Applicant's/Registrant's Name & Address:  Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		EPA Reg. No./File Symbol	42750-RTU	Page 1 of 5		
		Product TRICLOPYR B				
Ingredient: Triclopyr bu	itoxyethyl ester (BEE) CAS					Y:
Guideline Reference	Guideline Study Name	e	MRID Number	Submitter	Status \$	Note
				Albaugh	OWN	
				Albaugh	OWN	
				Albaugh	OWN	
						Waiver <sup>2</sup>
				Albaugh	OWN	
				Albaugh	OWN	
				Albaugh	, NWO	
				Albaugh	OWN	
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				Albaugh	OWN	
				Albaugh	OWN	
				Albaugh	OWN	
				-		Waiver <sup>3</sup>
						Not req'd1
Signature	· · · · Moc	2/2/6		Name and Title: Morris Gas Registratio	kins ns Manager	Date: 8/13/08

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	DA	TA MATRIX			
Date: 8/13/08			EPA Reg. No./File Symbol 42	750-RTU	Page 2 of 5
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021  Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7		Product: TRICLOPYR BEE TECHNICAL			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Guidenne Reference Number	Guideline Study Name	MKID Number	Submitter	Status	Waiver <sup>4</sup>
					Not reg'd <sup>1</sup>
					Waiver <sup>5</sup>
			Albaugh	OWN	Waive
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver <sup>6</sup>
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd1
			Albaugh	OWN	
					Waiver <sup>7</sup>
					Waiver <sup>7</sup>
Signature		Me	Name and Title: Morris Gaskin Registrations		Date: 8/13/08

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DATA MATRIX

Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021		EPA Reg. No./File Symbol	42750-RTU	Page 3 of !	
		Product: TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyeth	nyl ester (BEE) CAS # 64700-56-7		•		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
					Waiver <sup>8</sup>
			Albaugh	OWN	
			-		
				PAY	
				_	
Signature	•	Me-	Name and Title: Morris Gask Registration		Date: 8/13/08
	and Paper versions available. Submit only pap	per version.	Agency Pub	olic Use Copy	

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		DATA MATRIX			
Date: 8/13/08  Applicant's/Registrant's Name & Address:  Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		EPA Reg. No./File Symbol 42750-RTU		Page 4 of 5	
		Product: TRICLOPYR BEE TECHNICAL			
	hyl ester (BEE) CAS # 64700-56-7				
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr generic data requir					
Albaugh will make offers-to-pay	to the following companies that appear on	the current data submit			
			Nufarm Americas (228)	PAY	
			Lebanon Seaboard (961)	PAY	
			BASF Sparks (51036)	PAY	
			Dow Agroscience (62719)	PAY	
			SDTF (66607)	PAY	
			Repar Corp (69361)	PAY	
			United Phosphorous (70506)	PAY	
			ORETF (71754)	PAY	
			Ag Re-Entry Task Force (71755)	PAY	
			Nations Ag II (72167)	PAY	
			Endangered Species TF (73989)	PAY	
			Residential Exposure JV (74888)	PAY	
			AHETF (75234)	PAY	
Signature		Me	Name and Title: Morris Gaskins Registrations Manage	·r	Date: 8/13/08

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#### Footnotes for Triclopyr BEE Technical Data Matrix Page 5 of 5

#### Footnote 1

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- 830.6320 Corrosion characteristics
- 830.7370 Dissociation Constant

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#### Footnote 8

830.7860 Water Solubility, Generator Column Method. Albaugh requests a waiver for this data requirement. Albaugh elected to use Guideline 830.7840 to satisfy this data requirement.



#### TRICLOPYR BEE TECHNICAL

#### For Manufacturing Use Only

ACTIVE INGREDIENT:	
Triclopyr BEE*: (3,5,6-trichloro-2-pyridinyl)oxy]acetic acid, butoxyethyl ester	98.0%
INERT INGREDIENTS:	
TOTAL:	.00.0%
*Acid Equivalent: triclopyr – 70.4%	

#### CAUTION

#### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatment information.

#### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 42750-xxx RTU

**NET CONTENTS:** 

MANUFACTURED FOR: Albaugh, Inc. Ankeny, IA 50021

A Recyclosher solvers

#### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

#### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 32°F or agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, of puncture and dispose of in a sanitary landfill, or by other procedures approved by the state and local authorities.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

#### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

\* \* \* Studies Sent for Review \* \* \*

Decision#: (391538)

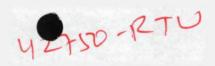
A7000704	Westmanked D. (2007) Trickens Tackrick D. described Esta	200 4FF0/D
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1550/Product Identity and composition
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1600/Description of materials used to produce the product
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1620/Description of production process
<del>1</del> 7383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1670/Discussion of formation of impurities
¥7383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1750/Certified limits
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1800/Enforcement analytical method
17383702	Sheehy, J. (2007) Preliminary Analysis: NUP-07134. Project Number: 23279, P809MS, 071011/7R. Unpublished study prepared by Product Safety Laboratories. 70 p.	830.1700/Preliminary analysis
47383703	Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.6302/Color
17383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.6303/Physical state
7383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.6304/Odor
7383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal Ions, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.6313/Stability to sunlight, normal and elevated temperatures, metals, and metal ions
7383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.7000/pH of water solutions or suspensions
7383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal Ions, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	_830.7050/UV/Visible absorption
17383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.7220/Boiling point/boiling range
	prepared by Product Safety Laboratories. 93 p.	33

MINE MED	(Silation Beterence	
47383703	Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p.	830.7300/Density/relative density
47383703	Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p.	830.7550/Partition coefficient (n-octanol/water), shake flask method
47383703	Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p.	830.7840/Water solubility: Column elution method, shake flask method



This package includes the following	for Division
New Registration     Amendment	AD BPPD • RD
Stydies? Fee Waiver? volpay % Reduction:	Risk Mgr. 25
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	826622 42750-RTU 3/26/2008
This item is NOT subject t	to FFS action.
Action Code:	Parent/Child Decisions:
Requested: 310  Granted: 310  Amount Due: \$ 4,360	
Inert Cleared for Intended Use	Uncleared Inert in Product
Reviewer: lomp lum	Date: 3/27/0(

Remarks:







"Morris Gaskins" <morrisg@albaughinc.com> 08/19/2008 01:57 PM To Shyam Mathur/DC/USEPA/US@EPA

CC

bcc

Subject Triclopyr BEE Technical

History:

This message has been replied to.

Dr. Mathur,

The attached addendum study is in response to your request last week for more detail on the manufacturing process and impurity formation for Albaugh's pending application for Triclopyr BEE Technical (File Symbol 42750-RTU).

Hard copies of this study are also being submitted today to Jim Tompkins (PM 25) as a formal submission.

Please call if you have any questions.

Regards,

Morris Gaskins Registrations Manager Albaugh, Inc. 229-244-3288

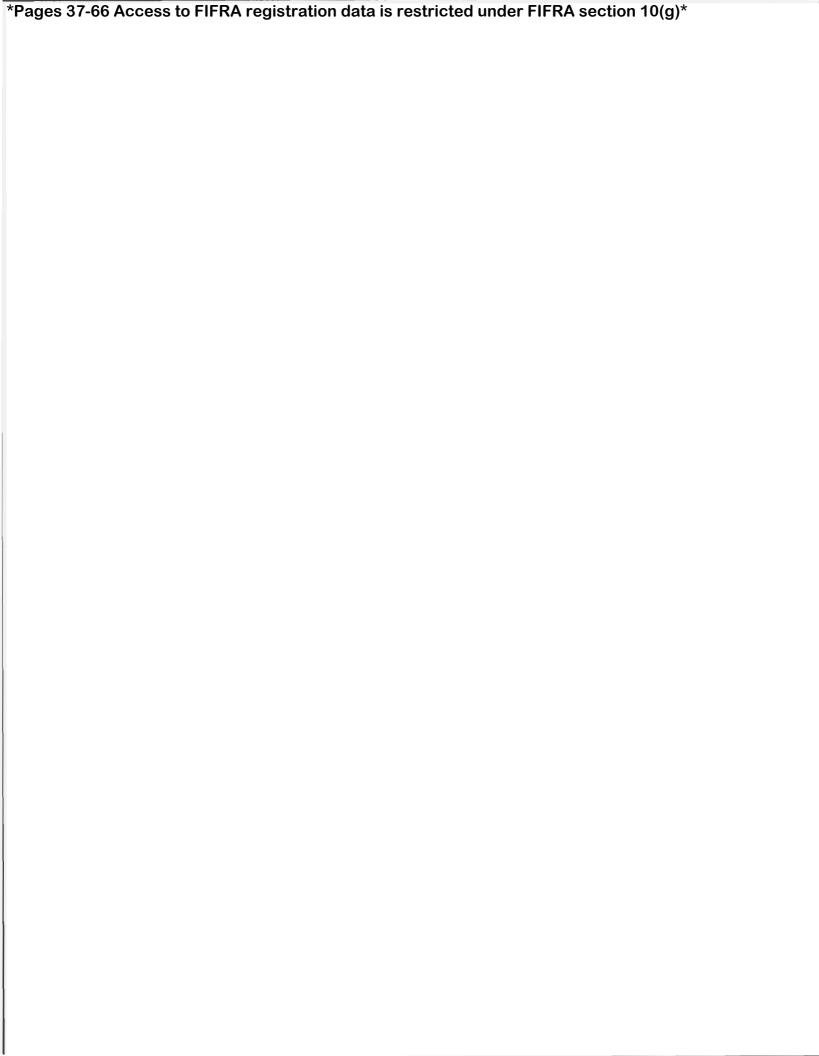
No virus found in this outgoing message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 270.6.5/1620 - Release Date: 8/19/2008 6:04 AM

1

Triclopyr BEE Technical (42750-RTU) product chemistry addendum.PDF









"Morris Gaskins" <morrisg@albaughinc.com> 08/13/2008 05:26 PM To Shyam Mathur/DC/USEPA/US@EPA

CC

bcc

Subject Triclopyr BEE Technical

Dr. Mathur,

Attached are two product chemistry studies conducted on Albaugh's pending application for Triclopyr BEE Technical (File Symbol 42750-RTU) that were submitted to Jim Tompkins (Team 25) today.

We anticipate submitting the upgraded manufacturing process information next week.

Regards,

Morris Gaskins Albaugh, Inc.

No virus found in this outgoing message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 270.6.2/1609 - Release Date: 8/13/2008 6:43 AM

1931

Triclopyr BEE Technical (42750-RTU) 830-B PhysChem (vapor pressure).PDF

Triclopyr BEE Technical (42750-RTU) 830-B PhysChem (oxredux-flammability-viscosity).PDF





## **DATA PACKAGE BEAN SHEET**

Date: 16-May-2008
Page 1 of 2

Registration Information \* \* \*

**Decision #: 391538** 

DP #: (352826)

**PRIA** 

Parent DP #:

**Submission #: 826622** 

Registration:	42750-RTU - TRICLOPY	R BEE TECHNIC	CAL		( \ 310
Company:	42750 - ALBAUGH INC				# 23463
Risk Manager:	RM 25 - James Tompkins - (70	03) 305-5697 Room#	PY1 S-7337		J 46 (
isk Manager Reviewer:	Tobi Colvin-Snyder TSNYDER	3		<del></del>	
Sent Date:	26-Mar-2008	Calculated Due Dat	e: 13-Oct-2008	Edited	Due Date:
Type of Registration:	Product Registration - Section	3			
Action Desc:	(R310) NEW PRODUCT;NON	-FAST TRACK (INCL	UDES REVIEWS (	OF PRODUCT CHEMIS	]
Ingredients:					~
	* * * Da	ta Package In	formation *	* *	
Expedite:		Date Ser	nt: 16-May-2008	_	Due Back:
DP Ingredient:					-
DP Title: Product Chemistry Review					
CSF Included:	Yes No Label	Included: Yes (	No Parer	nt DP #:	_
Assigned T	0	Date in	Date Out		
Organization: RD / 1	TRB			Last Possible Science	Due Date: 13-Sep-2008
Team Name:	hom			Science	Due Date:
Reviewer Name:	your Mathy	8/6/08	8/20/08	Sub Data Package	Due Date:
Contractor Name:	3				

\* \* \* Studies Sent for Review \* \* \*

Printed on Page 2

\* \* \* Additional Data Package for this Decision \* \* \*

No Additional Data Packages

\* \* \* Data Package Instructions \* \* \*

Please review the attached csfs and labels for this product and the cited product, and the submitted studies (MRIDs 47383701-03), and let me know if they satisfy requirments for registration of this product. Also, please let me know if this product is substantially similar to the cited product for the purpose of citing generic data. Let me know if you need additional information.

Thanks.

Tobi



Date: August 20, 2008

SUBJECT:

Product Chemistry Review of Triclopyr BEE Technical TGAI/MUP

FROM:

Shyam B. Mathur, PhD

Product Chemistry Team Leader

Technical Review Branch/RD (7505P)

TO:

Tobi Colvin-Snyder / James Tompkins, RM 25

Herbicide Branch / RD (7505P)

DP BARCODE: D352826 DECISION No.: 391538 File Symbol No.: 42750-RTU

PRODUCT: Triclopyr BEE Technical TGAI/MUP

PCC: 116004

**REGISTRANT: Albaugh Incorporation** 

USE: Herbicide FOOD USE: No

#### INTRODUCTION:

The registrant, Albaugh Incorporation, has submitted a registration application for the triclopyr BEE technical. In support of the application, the registrant has submitted 830 series group A & group B data with MRID Nos. 473837-01 thru 473837-03, the CSF for basic formulation (dated 03-24-08) and the product label. A revised basic CSF (dated 8-19-08) was submitted on 8-19-08. According to the registrant, the triclopyr BEE technical is manufactured by

The registrant has claimed that the proposed triclopyr BEE technical is substantially similar to Dow Agroscience's Triclopyr Butoxyethyl ester with Reg. No. 62719-87. The applicant has submitted additional product chemistry data on triclopyr BEE technical by e-mail on 8-13-08 & on 8-19-08. TRB has been asked to evaluate the product chemistry data submitted and determine its similarity to the registered technical product.

#### **SUMMARY OF FINDINGS:**

- 1. The registrant has submitted a revised basic formulation CSF (dated 08-19-08) for triclopyr BEE technical. The average purity of the active ingredient in TGAI/MUP is 98.0%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR§158.350(b)(2). The proposed limits for impurities ≥ 0.1% are based on the preliminary analysis and expected to occur in normal commercial production. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.320 and 158.350 respectively [MRID No. 473837-01].
- 2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.325 [MRID No. 473837-01].

3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of
production process) satisfy the data requirements for 40CFR§158.330. The triclopyr BEE tgai/mup was
produced in five step integrated batch procedure followed by the
The applicant has provided the details of the chemical process with reaction conditions,
equipment used, working up procedures, and quality assurance steps [MRID No. 473837-01 &
Addendum of 8-19-08 (e-mail)].

- 4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.340. During the production of triclopyr BEE tgai/mup, the registrant discussed the formation of major impurities present at the concentration of >0.1% along with the concentration of the formation of the organic impurities [MRID No. 473837-01].
- 5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.345. The study was conducted under GLP requirements in compliance with 40CFR§160. The analysis study was performed by *eurofins / Product Safety Laboratories, Dayton, NJ, USA*. Five representative batches of the triclopyr BEE technical ( were analyzed for percent active ingredient and the impurities. The identification & quantification of the AI and impurities were performed by combination of HPLC-UV (290nm) with external standard quantification. The analytical methods utilized a Supelco Ascentis RP-Amide column, 250 x 4.6 mm x 5 µm. The analytical methods were validated for accuracy, linearity, and precision [MRID Nos. 473837-02].
- 6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.355. The purity of the AI in the TGAI was determined by HPLC-UV (290 nm) by external standard method. The method was validated for precision, accuracy and linearity [MRID Nos. 473837-01].
- 7. The data submitted corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility) satisfy the data requirements of 40CFR§158.310 (e) [MRID Nos. 473837-03].
- 8. The registrant has submitted (e-mail, 8-13-08) data for the following guidelines: 830.6314 (oxidation/reduction), 830.6315 (flammability), 830.7100 (viscosity) and 830.7950 (vapor pressure).

#### DP BARCODE: <u>D352826</u>; FILE SYMBOL No.: <u>42750-RTU</u>; PRODUCT: <u>Triclopyr BEE Technical</u>

#### CONCLUSIONS:

The TRB has reviewed the product chemistry data submitted for triclopyr BEE TGAI / MUP ( and has concluded that:



- 1. All the product chemistry data submitted corresponding to the guidelines 830 Series group A and group B are acceptable.
- 2. The CSF for basic formulation (dated 03-24-08) is acceptable. No new impurities are listed in the proposed CSF. There are impurities reported in the CSF which are also present in the cited product.
- 3. The data submitted corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility) and the additional data submitted on 8-13-08 by e-mail for the following guidelines: 830.6314 (oxidation/reduction), 830.6315 (flammability), 830.7100 (viscosity), and 830.7950 (vapor pressure) satisfy the data requirements of 40CFR§158.310 (e) [MRID Nos. 473837-03 & e-mail 8-13-08] are acceptable.
- 4. The registrant either cite or submit data for 830.6316 (explodability), 830.6317 (one year storage stability), 830.6320 (corrosion characteristics), and 830.7370 (dissociation constant). The registrant can also request waivers for the guidelines with proper scientific justifications.
- 5. The registrant must conduct the one year storage stability (830.6317) and corrosion characteristics (830.6320) for the proposed triclopyr BEE tgai/mup under full GLP requirements. It is recommended that the observations should be made at the intervals of 0 (initial), 3 month, 6 month, 9 month, and 12 month (final). The results must be submitted to the Agency on completion.
- 6. The proposed product with File Symbol No. 42750-RTU was determined to be substantially similar to the registered product with Reg. No. 62719-87 from product chemistry point of view.

**Note to PM:** Please do not route to TRB the additional data submitted by the registrant via e-mail to the reviewer dated 08-13-08, 08-19-08 and the revised basic CSF (dated 8-19-08). The originals have been sent to PM. These have been reviewed already by TRB in this report.

DP BARCODE: <u>D352826</u>; FILE SYMBOL No.: <u>42750-RTU</u>; PRODUCT: <u>Triclopyr BEE Technical</u>

830.1550. Product identity & Composition: (MRID No. 473837-01)

Common Name: Triclopyr BEE

Chemical name (IUPAC): 2-butoxyethyl 3, 5, 6-trichloro-2-pyridyloxyacetate

(CAS) : 2-butoxyethyl [3, 5, 6-trichloro-2-pyridinyl)oxy]acetate

CAS No.: 64700-56-7

PC Code No.: 116004

Empirical formula: C<sub>13</sub>H<sub>16</sub>Cl<sub>3</sub>NO<sub>4</sub>

Molecular Weight: 356.63

Structural formula:

Table 1. Manufacturing and Impurity Data for Triclopyr BEE TGAI/MUP					
GLN	Requirement	MRID	Status	Details and /or Deficiency	
830.1550	Product Identity and composition	Revised Basic CSF (08-19-08)	A	The NC of AI (98.0%) is supported by 5 batch analysis & agrees with the label claim NC. impurities are listed on the CSF along with	
8301600	Description of materials used to produce the product	473837-01	A	The description & composition for all the starting materials used to produce the triclopyr BEE technical have been provided by the registrant	
830.1620	Description of production process	473837-01	A	The AI was produced five steps integrated process. This was followed by  The production process has been described in full details. The reaction conditions, amounts of chemicals in each step, duration of time, and the yields in each step have been provided.	
830.1670	Discussion of formation of impurities	473837-01	A	The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present at the levels of ≥ 0.1%. No impurity of tox concern was reported.	
830.1700	Preliminary analysis	473837-02	A	Five representative batches of triclopyr BEE technical were analyzed for percent active ingredient and the impurities.  The identification & quantification of the AI and the impurities in the TGAI were determined by HPLC-UV (290 nm) with external standard method. The five batch analysis supported the proposed CSF for basic formulation.	
830.1750	Certified limits	473837-01	A	The proposed certified limits for the Al are based on standard certified limit table, whereas, those of impurities are based on five batch analysis.	
830.1800	Enforcement analytical method	473837-01	A	The HPLC-UV (290 nm) with external standard method was used for the determination of the AI content in the TGAI/MUP. The method was validated for precision, linearity and accuracy  G = Data gap: I = In progress or need upgrade: U	

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required

830 Series group B (Physical-Chemical Properties)

	330 Series group B (Physical-Chemical Properties)  Table 2: Physical and Chemical Properties of : Triclopyr BEE TGAI/MUP (					
GLN	Requirement	MRID	Status	Result or Deficiency		
830.6302	Color	473837-03	Α	Dark brown		
830.6303	Physical state		Α	Viscous liquid		
830.6304	Odor	u u u	Α	Alcohol like odor		
830.6313	Stability to normal and elevated temperatures, metals, and metal ions		Α	Stable at RT & 54°C & RT for 14 days. No reaction with Fe powder, Fe acetate, Al powder & Al acetate at RT & 54°C.		
830.6314	Oxidation/reduction: chemical incompatibility	e-mail 8-13-08	A	Compatible with water, 10% monoammonium phosphate, Fe powder, 10% KMnO <sub>4</sub> and kerosene		
830.6315	Flammability	n n n	A	100°C		
830.6316	Explodability		NA			
830.6317	Storage stability		G			
830.6319	Miscibility		NA			
830.6320	Corrosion characteristics		G			
830.7000	pH	473837-03	Α	3.56		
830.7050	UV/Visible absorption	и и и	Α	Note 1		
830.7100	Viscosity	e-mail	A	20°C 40°C		
		8-13-08		114.549 cts 27.843 cts		
830.7200	Melting point		NA			
830.7220	Boiling point	473837-03	Α	> 350°C		
830.7300	Density	473837-03	Α	1.313 g/ml		
830.7370	Dissociation constants in water (DC)		G			
830.7550	Partition coefficient	473837-03	Α	Log Po/w = 4.43 ± 0.12		
830.7840	Water solubility:	aa aa aa	A	$3.011 \times 10^{-3} \pm 0.037 \times 10^{-3}$ g/L (mean)		
830.7950	Vapor pressure	e-mail 8-13-08	A	2.3 x 10 <sup>-3</sup> @ 25°C		

 $A = Acceptable; \ N = unacceptable \ (see \ Deficiency); \ N/A = Not \ Applicable; \ G = Data \ gap; \ I = In \ progress \ or \ need \ upgrade; \ U = Upgrade \ (additional \ information \ required); \ TBA = To \ Be \ Assigned$ 

## DP BARCODE: <u>D352826</u>; FILE SYMBOL No.: <u>42750-RTU</u>; PRODUCT: <u>Triclopyr BEE Technical</u>

## Note1. 830.7050 (UV/VIS): (MRID No. 473837-03)

Medium	Wavelength (nm)	ε value calculated
Neutral	232	9773.2
	295	5950.0
Acidic	232	10231.5
	295	6292.7
Alkaline	234	10557.8
	297	6510.3

#### 830.1800. Enforcement of analytical method: (MRID No. 473837-01)

The five batches of NUP-07134 were assayed by a validated analytical method based on high performance liquid chromatography (HPLC) employing an external standard technique with ultraviolet (UV) detection.

The following conditions were used.

Instrument:

Thermo Finnigan with Thermo Surveyor PDA Detector

Column:

Supelco Ascentis RP-Amide, 5 µm, 250 x 4.6 mm

Column temperature:

30 °C

Mobile phase gradient (min.)	Acetonitrile	Water (adjusted to pH 2.9)
0	65	35
15	65	35
20	90	10
32	90	10
37	65	35
40	65	35

5 µl

Flow rate: 1.0 mL/min

Injection volume:

Detector: PDA, 290 nm

Run Time: 40.0 min.

Retention time observed for Triclopyr BEE: Approximately 18 minutes

#### STANDARD PREPARATION

A stock solution was prepared by accurately weighing an appropriate amount of reference standard into a 100 mL volumetric flask, diluting to volume with acetonitrile, and sonicating for 10 minutes. Two dilutions were performed from the stock solution to bracket the sample concentration

#### SAMPLE PREPARATION

Approximately 0.1 gram aliquots of each batch of the test substance were accurately weighed into separate 100 mL volumetric flasks, diluted to volume with acetonitrile, and sonicated for 10 minutes. Dilutions of these stock solutions at 1/10 were performed using acetonitrile. Each batch was prepared in duplicate, and each preparation was injected in duplicate

#### **ANALYSIS**

At the beginning of the analysis, the instrument was equilibrated until a stable, consistent baseline was obtained. The standards and samples were injected at consistent time intervals in order to maintain a steady baseline. A solvent blank and standards were run; all samples were injected in duplicate. Following up to four sample injections, standard preparations were run to confirm system stability and calibration. The sample purities were calculated using the standards bracketing every four sample solutions

From the data obtained by the analytical method, the purity of each sample of Triclopyr (technical grade) was calculated by reference to the calibration curve.

#### Calculation:

% Assay = Sample Pk Area/Avg Response of the Std x % Purity of Std Sample Conc ( $\mu$ g/mL)

where: Avg Response of the Std = Avg [Std Pk Area/Std Conc (µg/mL)]

#### METHOD VALIDATION

The method was validated as reported in the preliminary analysis study, Eurofins PSL Laboratories Laboratory Study # 23279.

#### **Detector Linearity**

Prior to analysis, detector response linearity was confirmed using test substance solutions targeted to bracket the expected concentration for optimum product analysis. Stock solutions were prepared by accurately weighing appropriate amounts of one batch of the test substance into separate 100 mL volumetric flasks, diluting to volume with acetonitrile, and mixed well by sonication for 10 minutes. Dilutions of 1/10 of the stock solutions were performed using acetonitrile and mixing the solution well. Linear regression of the major peak gave a coefficient of determination  $(r^2)$  of 0.9993 and was considered to be acceptable

#### Precision

Chromatography of four replicate injections of the midpoint linearity solution produced a relative standard deviation for this study of 0.44%.

\*Confidential Statement of Formula may be entitled to confidential treatment\*

DP BARCODE: D352826; FILE SYMBOL No.: 42750-RTU; PRODUCT: Triclopyr BEE Technical

DP BARCODE: D352826; FILE SYMBOL No.: 42750-RTU; PRODUCT: Triclopyr BEE Technical

## **CONFIDENTIAL APPENDIX**

830.1600. Description of Materials used to produce the product: (MRID No. 473837-01)

DP BARCODE: <u>D352826</u>; FILE SYMBOL No.: <u>42750-RTU</u>; PRODUCT: <u>Triclopyr BEE Technical</u>

DP BARCODE: <u>D352826</u>; FILE SYMBOL No.: <u>42750-RTU</u>; PRODUCT: <u>Triclopyr BEE Technical</u>

DP BARCODE: D352826; FILE SYMBOL No.: 42750-RTU; PRODUCT: Triclopyr BEE Technical

*Manufacturing process information may be entitled to confidential treatment*
DP BARCODE: D352826; FILE SYMBOL No.: 42750-RTU; PRODUCT: Triclopyr BEE Technical
CONFIDENTIAL APPENDIX

*Manufacturing process information may be entitled to confidential treatment*
-------------------------------------------------------------------------------

DP BARCODE: <u>D352826</u>; FILE SYMBOL No.: <u>42750-RTU</u>; PRODUCT: <u>Triclopyr BEE Technical</u>

*Manufacturing process information may be entitled to confidential treatment*	
DP BARCODE: D352826; FILE SYMBOL No.: 42750-RTU; PRODUCT: Triclopyr BEE Technical	
CONFIDENTIAL APPENDIX	

DP BARCODE: <u>D352826</u>; FILE SYMBOL No.: <u>42750-RTU</u>; PRODUCT: <u>Triclopyr BEE Technical</u>



## **DATA PACKAGE BEAN SHEET**

Date: 11-Jun-2008 Page 1 of 2

**Decision #: 391538** 

DP #: (353538)

**Submission #: 826622** 

Parent DP #:

## Registration Information \* \* \*

Registration: 42750-RTU - TRIC	LOPYR BEE TECHNICAL	P310
Company: 42750 - ALBAUGH INC		( ) ( )
Risk Manager: RM 25 - James Tompki	ins - (703) 305-5697 Room# PY1 S-7337	1310
Risk Manager Reviewer: Tobi Colvin-Snyder TS	NYDER	
Sent Date: 26-Mar-2008	Calculated Due Date: 13-Oct-2008	Edited Due Date:
Type of Registration: Product Registration - S	Section 3	
Action Desc: (R310) NEW PRODUC	T;NON-FAST TRACK (INCLUDES REVIEWS OF PROD	DUCT CHEMIST
Ingredients:	116004	
**	* Data Package Information * * *	
Expedite: Yes No	Date Sent: 11-Jun-2008	Due Back:
DP Ingredient:		
Assigned To Organization: RD / TRB	Date In Date Out	ssible Science Due Date: 13-Sep-2008
		Science Due Date:
		Data Package Due Date:
Contractor Name:		Data I acrage Due Date.
***	Studies Sent for Review * * *	
	No Studies	
* * * Additiona	Il Data Package for this Decision * *	*
	Printed on Page 2	
***D	ata Package Instructions * * *	
Please review the attached labels and csfs for	this product and the cited product, as well as the acute to the cited product for the puropse of satsifying both pro	
Thanks.		

cite all

Tobi



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

## **TECHNICAL REVIEW BRANCH** SIMILARITY CLINIC DETERMINATION

08/SEPT/2008

**MEMORANDUM** 

Subject: Name of Pesticide Product: Triclopyr BEE Technical

> EPA Reg. No. /File Symbol: 42750-RTU DP Barcode: D353538

Decision No:

391538

Action Code:

R310

PC Code:

116004 (triclopyr butoxy ethyl ester)

From:

Eugenia McAndrew, Biologist

E.Mchh Hashi

Technical Review Branch Registration Division (7505P)

To:

Tobi Colvin-Snyder, RM Team 25

Herbicide Branch

Registration Division (7505P)

Applicant:

Albaugh, Inc.

1525 NE 36th Street Ankeny, IA 50021

FORMULATION FROM LABEL:

Active Ingredient(s):

% by wt.

Triclopyr BEE

98.0

Inert Ingredient(s):

2.0

Total:

100.0%

**ACTION REQUESTED:** The Risk Manager requests similarity determination for 42750-RTU, proposed product, and 62719-87, cited product.

**BACKGROUND**: Albaugh, Inc. has applied for registration of Triclopyr BEE Technical, EPA File Symbol 42750-RTU, claiming similarity to Triclopyr Butoxyethyl Ester, EPA Reg. No. 62719-87. Both products are technical grade for manufacturing use only.

The Registrant is using the cite-all method of data support to satisfy the acute toxicity data requirements. A search of the OPP electronic databases shows that acute toxicity data submitted to support the registration of the cited product, 62719-87, were reviewed and classified as acceptable in three prior Product Reregistration Branch memos (Piansay; D258659; 29/SEPT/1999, Lewis; D262063; 12/JAN/2000 and Lewis; D268193; 24/AUG/2000).

**RECOMMENDATIONS**: TRB has evaluated the formulations of the proposed product, 42750-RTU, and the cited product, 62719-87, and has determined that the two products are substantially similar.

The acute toxicity profile for the proposed product, Triclopyr BEE Technical, EPA File Symbol 42750-RTU, is as follows:

Acute oral toxicity	III	Cited	EPA Reg. No. 62719-87
Acute dermal toxicity	IV	Cited	EPA Reg. No. 62719-87
Acute inhalation toxicity	IV	Cited	EPA Reg. No. 62719-87
Primary eye irritation	III	Cited	EPA Reg. No. 62719-87
Primary skin irritation	IV	Cited	EPA Reg. No. 62719-87
Dermal sensitization	positive	Cited	EPA Reg. No. 62719-87

The proposed basic CSF dated August 19, 2008 has been accepted by the TRB Product Chemistry Team (Mathur; D352826; 20/AUG/2008).

**LABELING**: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #:

042750-00174

**PRODUCT NAME:** 

Triclopyr BEE Technical

#### **PRECAUTIONARY STATEMENTS**

**SIGNAL WORD:** 

CAUTION

#### **Hazards to Humans and Domestic Animals:**

Harmful if swallowed. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with eyes or clothing. [Wear protective eyewear.]\*

<sup>\*[</sup>Protective eyewear may be specified, if appropriate.]

#### First Aid:

#### If swallowed:

- -Call a poison control center or doctor immediately for treatment advice.
- -Have person sip a glass of water if able to swallow.
- -Do not induce vomiting unless told to by a poison control center or doctor.
- -Do not give anything to an unconscious person.

#### If in eyes:

- -Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- -Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

#### CORPORATE OFFICE

1525 NE 36th Street Ankeny, IA 50021 515.964.9444 - Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile



Valdosta Office

P.O Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

#### FEDERAL EXPRESS

March 24, 2008

Mr. Jim Tompkins (PM 25) Registration Division Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 2777 South Crystal Dr. Arlington, VA 22202

RE:

Triclopyr BEE Technical EPA Reg. No. 42750-appl.

Dear Mr. Tompkins,

The enclosed submission is Albaugh's initial application for the above referenced product. Albaugh is submitting this as a "me too" of Dow AgroScience's Triclopyr Butoxyethyl Ester (EPA Reg. No. 62719-87). Albaugh believes this application qualifies as a PRIA II R310 classification with a \$4.360 fee and 6 month review time. The fee payment has been submitted to the EPA lockbox concurrently with this application.

Documents supporting this application are detailed on the enclosed transmittal page.

Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc. 229-244-3288



### TRANSMITTAL DOCUMENT

#### Name and address of submitter:

Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

### Regulatory action for which this package is submitted:

Initial application to register Triclopyr BEE Technical

Transmittal Date: March 24, 2008

#### List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)
- PRIA payment check copy
- Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, Cartified Limits, and Enforcement Analytical Method (OPPTS Guidelines 830.1550, 830.1300, 830.1620, 830.1670, 830.1750, and 830.1800) (3 copies)
- Series 830-A Preliminary Analysis (OPPTS Guideline 830.1700) (3 copies:
- Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.3303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7220, 830.7300, 830.7550, & 830.7840) (3 copies)



## **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY** 401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE

Do not send the completed form to this address.				
Certification with Respect to Citation of Data				
Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604	EPA Registration Number/File Symbol 42750-appl			
Active Ingredient(s) and/or representative test compound(s) triclopyr butoxyethyl ester		Date 3/24/08		
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 terrestrial food use, terrestrial non-food use	) 	Product Name Triclopyr BEE Technical		
<b>NOTE:</b> If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form	ed product labeled for 8570-27).	or all the same uses on your label, you do not need to		
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should		
SECTION I: METHOD OF DATA SUPP	ORT (Check one m	ethod only)		
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).  I am using the selective method of support (or cite-all optic under the selective method), and have included with this form completed list of data requirements (the Data Matrix form used).				
SECTION II: GENERAL (	OFFER TO PAY			
[Required if using the cite-all method or when using the cite-all option under the selection of the cite-all options of the cite-a		•		
SECTION III: CERTI	FICATION			
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.				
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained		
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.				
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and spidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.				
l certify that the statements I have made on this form and all attachments to it are true, accurate, and conւթեեծ. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable lava:				
Date Typed or Printed Name and Title Mar 24, 2008 Morris Gaskins Registrations Manager				

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DATA MATRIX		
	EDA Peg No /File Symbol	42

**Product** 

42750-appl

Page 1 of 5

Applicant's/Registrant's Name & Address:

Date: 3/24/08

Albaugh Inc. 121 NE 18<sup>th</sup> St.

Ankeny, IA 50021

TRICLOPYR BEE TECHNICAL

<b>Guideline Reference</b>	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	With application	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN	
830.1620	Description of Production Process	With application	Albaugh	OWN	
830.1650	Description of Formulation Process				Waiver <sup>2</sup>
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN	
830.1700	Preliminary Analysis	With application	Albaugh	OWN	
830.1750	Certified Limits	With application	Albaugh	OWN	
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN	
830.6302	Color	With application	Albaugh	OWN	
830.6303	Physical State	With application	Albaugh	OWN	
830.6304	Odor	With application	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	With application	Albaugh	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility				Not req'd
830.6315	riammability				Not req'd
830.6316	Explodability				Not req'd
830.6317	Storage Stability				Not req'd
Signature	M. Dila		Name and Title: Mo	rris Gaskins gistrations Manager	Date: 3/24/08

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	DATA	MATRIX			
Date: 3/24/08  Applicant's/Registrant's Name & Address: Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021  Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7			EPA Reg. No./File Symbol 42750	-appl	Page 2 of 5
			Product: TRICLOPYR BEE TECHNICAL		
<b>Guideline Reference Number</b>	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				Not req'd1
830.6320	Corrosion Characteristics	-			Not req'd1
830.6321	Dielectric Breakdown Voltage				Not req'd1
830.7000	pH	With application	Albaugh	OWN	
830.7050	UV/Visible Absorption	With application	Albaugh	OWN	
830.7100	Viscosity				Not req'd1
830.7200	Melting Point/Melting Range				Waiver <sup>3</sup>
830.7220	Boiling Point/Boiling Range	With application	Albaugh	OWN	
830.7300	Density/Relative Density/Bulk Density	With application	Albaugh	OWN	
830.7370	Dissociation Constants in Water				Waiver <sup>4</sup>
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	With application	Albaugh	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Waiver <sup>5</sup>
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Waiver <sup>5</sup>
Signature		M	Name and Title: Morris Gaskins Registrations Ma	nager	Date: 3/24/08

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DATA MATRIX						
Date: 3/24/08			EPA Reg. No./File Symbol 42750	O-appl	Page 3 of 5	
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021  Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7			Product: TRICLOPYR BEE TECHNICAL			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	With application	Albaugh	OWN		
830.7860	Water Solubility, Generator Column Method				Waiver <sup>6</sup>	
830.7950	Vapor Pressure			-	Not req'd1	
870.1100	Acute Oral Toxicity – Rat	CITE ALL		PAY		
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY		
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY		
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY		
870.2500	Primary Dermal Irritation	CITE ALL		PAY		
870.2600	Dermal Sensitization	CITE ALL		PAY		
·						
Signature		NOP	Name and Title: Morris Gaskins Registrations Man	ager	Date: 3/24/08	

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	DA	TA MATRIX			
Date: 3/24/08		EPA Reg. No./File Symbol 42750-appl		Page 4 of 5	
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021		Product: TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyet	hyl ester (BEE) CAS # 64700-56-7				
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr generic data requir	ements				
Albaugh will make offers-to-pay of March 21, 2008	to the following companies that appear on the	current data subn	nitters list for Triclopyr Butoxyethyl Ester as		
Triclopyr BEE data	Cite-All		Nufarm Americas (228)	PAY	
Triclopyr BEE data	Cite-All		Lebanon Seaboard (961)	PAY	
Triclopyr BEE data	Cite-All		BASF Sparks (51036)	PAY	
Triclopyr BEE data	Cite-All		Dow Agroscience (62719)	PAY	
Triclopyr BEE data	Cite-All		SDTF (66607)	PAY	
Triclopyr BEE data	Cite-All		Repar Corp (69361)	PAY	
Triclopyr BEE data	Cite-All		United Phosphorous (70506)	PAY	
Triclopyr BEE data	Cite-All		ORETF (71754)	PAY	
Triclopyr BEE data	Cite-All		Ag Re-Entry Task Force (71755)	PAY	
Triclopyr BEE data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr BEE data	Cite-All		Endangered Species TF (73989)	PAY	
Triclopyr BEE data	Cite-All		Residential Exposure JV (74888)	PAY	
Triclopyr BEE data	Cite-Ail		AHETF (75234)	PAY	
Signature		CP.	Name and Title: Morris Gaskins Registrations Manager		Date: 3/24/08

#### Footnotes for Triclopyr BEE Technical Data Matrix Page 5 of 5

#### Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6315 Flammability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830.6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity
- 830.7950 Vapor Pressure

This data is not required for technical products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

#### Footnote 2

- 830.1650 Formulation Process. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not formulated. See Guideline 830.1620.

#### Footnote 3

- 830.7200 Melting Point. Because triclopyr ester is a liquid product this guideline is not appropriate and Albaugh requests a waiver for this data requirement.

#### Footnote 4

830.7370 Dissociation Constant in Water.

Dissociation constant is used to measure the dissociation potential of strong acids and bases in the environment. An evaluation of the triclopyr ester molecular structurity its neutral pH value indicates that it will not dissociate. An exhaustive public literature search reveals no pKa value is given for triclopyr butoxyethyl ester. According to Tr Pesticide Manual, Eleventh Edition, page xix, "where no pKa value is given, it may indicate that no significant dissociation occurs in the environmental range; values of pKa for bases and pKa >8 for acids are not relevant in an environmental context". Since Triclopyr Butoxyethyl ester is not a storng acid or base and does not contain any acid functional group Albaugh requests a waiver for this data requirement.

#### Footnote 5

830.7570 Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography. See Guideline 830.7550.

#### Footnote 7

- 830.7860 Water Solubility, Generator Column Method. See guideline 830.7840.

Date: August 20, 2008

SUBJECT:

Product Chemistry Review of Triclopyr BEE Technical TGAI/MUP

FROM:

Shyam B. Mathur, PhD

Product Chemistry Team Leader Technical Review Branch/RD (7505P)

TO:

Tobi Colvin-Snyder / James Tompkins, RM 25

Herbicide Branch / RD (7505P)

DP BARCODE: D352826 DECISION No.: 391538 File Symbol No.: 42750-RTU

PRODUCT: Triclopyr BEE Technical TGAI/MUP

PCC: 116004

**REGISTRANT: Albaugh Incorporation** 

USE: Herbicide FOOD USE: No

#### INTRODUCTION:

The registrant, Albaugh Incorporation, has submitted a registration application for the triclopyr BEE technical. In support of the application, the registrant has submitted 830 series group A & group B data with MRID Nos. 473837-01 thru 473837-03, the CSF for basic formulation (dated 03-24-08) and the product label. A revised basic CSF (dated 8-19-08) was submitted on 8-19-08. According to the registrant, the triclopyr BEE technical is manufactured by

The registrant has claimed that the proposed triclopyr BEE technical is substantially similar to Dow Agroscience's Triclopyr Butoxyethyl ester with Reg. No. 62719-87. The applicant has submitted additional product chemistry data on triclopyr BEE technical by e-mail on 8-13-08 & on 8-19-08. TRB has been asked to evaluate the product chemistry data submitted and determine its similarity to the registered technical product.

#### **SUMMARY OF FINDINGS:**

- 1. The registrant has submitted a revised basic formulation CSF (dated 08-19-08) for triclopyr BEE technical. The average purity of the active ingredient in TGAI/MUP is 98.0%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR§158.350(b)(2). The proposed limits for impurities ≥ 0.1% are based on the preliminary analysis and expected to occur in normal commercial production. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.320 and 158.350 respectively [MRID No. 473837-01].
- 2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.325 [MRID No. 473837-01].

# DP BARCODE: D352826; FILE SYMBOL No.: 42750-RTU; PRODUCT: Triclopyr BEE Technical

- 3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.330. The triclopyr BEE tgai/mup was produced in five step integrated batch procedure followed by the washing, drying and evaporation of the solvent. The applicant has provided the details of the chemical process with reaction conditions, equipment used, working up procedures, and quality assurance steps [MRID No. 473837-01 & Addendum of 8-19-08 (e-mail)].
- 4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.340. During the production of triclopyr BEE tgai/mup, the registrant discussed the formation of major impurities present at the concentration of >0.1% along with the registrant provided the mechanism of the formation of the organic impurities [MRID No. 473837-01].
- 5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.345. The study was conducted under GLP requirements in compliance with 40CFR§160. The analysis study was performed by *eurofins / Product Safety Laboratories, Dayton, NJ, USA.* Five representative batches of the triclopyr BEE technical (which is a study were analyzed for percent active ingredient and the impurities. The identification & quantification of the AI and impurities were performed by combination of HPLC-UV (290nm) with external standard quantification. The analytical methods utilized a Supelco Ascentis RP-Amide column, 250 x 4.6 mm x 5 µm. The analytical methods were validated for accuracy, linearity, and precision [MRID Nos. 473837-02].
- 6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.355. The purity of the AI in the TGAI was determined by HPLC-UV (290 nm) by external standard method. The method was validated for precision, accuracy and linearity [MRID Nos. 473837-01].
- 7. The data submitted corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility) satisfy the data requirements of 40CFR§158.310 (e) [MRID Nos. 473837-03].
- 8. The registrant has submitted (e-mail, 8-13-08) data for the following guidelines: 830.6314 (oxidation/reduction), 830.6315 (flammability), 830.7100 (viscosity) and 830.7950 (vapor pressure).

# DP BARCODE: D352826; FILE SYMBOL No.: 42750-RTU; PRODUCT: Triclopyr BEE Technical

### **CONCLUSIONS:**

The TRB has reviewed the product chemistry data submitted for triclopyr BEE TGAI / MUP (and has concluded that:

- 1. All the product chemistry data submitted corresponding to the guidelines 830 Series group A and group B are acceptable.
- 2. The CSF for basic formulation (dated 33) is acceptable. No new impurities are listed in the proposed CSF. There are a impurities reported in the CSF which are also present in the cited product.
- 3. The data submitted corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6313 (stability to normal & elevated temperature, metal & metal ions), 830.7000 (pH), 830.7050 (UV/VIS), 830.7300 (density), 830.7220 (boiling point), 830.7550-7570 (partition coefficient), 830.7840-7860 (water solubility) and the additional data submitted on 8-13-08 by e-mail for the following guidelines: 830.6314 (oxidation/reduction), 830.6315 (flammability), 830.7100 (viscosity), and 830.7950 (vapor pressure) satisfy the data requirements of 40CFR§158.310 (e) [MRID Nos. 473837-03 & e-mail 8-13-08] are acceptable.
- 4. The registrant either cite or submit data for 830.6316 (explodability), 830.6317 (one year storage stability), 830.6320 (corrosion characteristics), and 830.7370 (dissociation constant). The registrant can also request waivers for the guidelines with proper scientific justifications.
- 5. The registrant must conduct the one year storage stability (830.6317) and corrosion characteristics (830.6320) for the proposed triclopyr BEE tgai/mup under full GLP requirements. It is recommended that the observations should be made at the intervals of 0 (initial), 3 month, 6 month, 9 month, and 12 month (final). The results must be submitted to the Agency on completion.
- 6. The proposed product with File Symbol No. 42750-RTU was determined to be substantially similar to the registered product with Reg. No. 62719-87 from product chemistry point of view.

**Note to PM:** Please do not route to TRB the additional data submitted by the registrant via e-mail to the reviewer dated 08-13-08, 08-19-08 and the revised basic CSF (dated 8-19-08). The originals have been sent to PM. These have been reviewed already by TRB in this report.



"Morris Gaskins" <morrisg@albaughinc.com> 08/12/2008 06:39 PM To Shyam Mathur/DC/USEPA/US@EPA

CC

bcc

Subject Triclopyr BEE Technical (File Symbol 42750-RTU)

Dr. Mathur,

My apologies for getting back to you so late.

I have spoken with the original sponsor of the product chemistry studies for Triclopyr BEE Technical (42750-RTU) and they have the studies in hand for the missing 830-B Phys/Chem data you noted. We will submit those this week along with the appropriate waiver request for the other data gaps (miscibility, explodability & dialectric breakdown).

The 12-month Storage Stability and Corrosion Characteristics studies are underway but will not complete for several months.

We have requested that the author of the manufacturing process report upgrade the 830.1620 Production Process and 830.1670 Formation of Impurities guidelines. However, this may take a few days but we hope to have that submitted by the end of next week.

Thanks for you guidance and patience in this matter.

Regards,

Morris Gaskins Registrations Manager Albaugh, Inc. 229-244-3288

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DATA PACKAGE BEAN SHEET

Date: 11-Jun-2008 Page 1 of 2

**Decision #: 391538** 

DP #: (353538)

**PRIA** 

Parent DP #:

**Submission #: 826622** 

	•	* * Registration in	ormation *		
Registration:	42750-RTU - TRIC	LOPYR BEE TECHNIC	CAL		<del></del>
Company:	42750 - ALBAUGH INC				
Risk Manager:	RM 25 - James Tompki	ns - (703) 305-5697 Room#	PY1 S-7337		
lisk Manager Reviewer:	Tobi Colvin-Snyder TS	NYDER			
Sent Date:	26-Mar-2008	d Due Date:			
Type of Registration:	Product Registration - S	Section 3			
Action Desc:	(R310) NEW PRODUC	T;NON-FAST TRACK (INCL	UDES REVIEWS	OF PRODUCT CHEM	<u>ısı</u>
Ingredients:					
	* *	* Data Package In	formation *	**	
Expedite:	○ Yes ● No	Date Se	nt: 11-Jun-2008	_	Due Back:
DP Ingredient:		· · · · · · · · · · · · · · · · · · ·			
DP Title:	Acute Toxicology Simila	arity Determination			_
CSF Included:	● Yes ○ No	Label Included: Yes	○ No Pare	ent DP #:	
Assigned To	0_	Date in	Date Out	_	
Organization: RD / T	RB			_ Last Possible Science	e Due Date: 13-Sep-2008
Team Name:				_ Science	e Due Date:
Reviewer Name:				Sub Data Packao	ie Due Date:

\* \* \* Studies Sent for Review \* \* \*

No Studies

\* \* \* Additional Data Package for this Decision \* \* \*

Printed on Page 2

\* \* \* Data Package Instructions \* \* \*

Please review the attached labels and csfs for this product and the cited product, as well as the acute toxicity review of the cited product, and let me know if this product is substantially similar to the cited product for the puropse of satsifying both product specific acute toxicity and generic data requirements. Let me know if you need additional information.

Thanks.

Contractor Name:

Tobi

# **DATA PACKAGE BEAN SHEET**

Date: 16-May-2008 Page 1 of 2

**Decision #: 391538** 

DP #: (352826)

**PRIA** 

Parent DP #:

**Submission #: 826622** 

# Registration Information \* \* \*

riegionation.	42750-RTU - TRICLOF	YR BEE TECHNIC	AL	
Company:	42750 - ALBAUGH INC			
Risk Manager:	RM 25 - James Tompkins - (			
sk Manager Reviewer:	Tobi Colvin-Snyder TSNYDB			
Sent Date:	26-Mar-2008	Calculated Due Date	: 13-Oct-2008	Edited Due Date:
Type of Registration:	Product Registration - Section	n 3_		
Action Desc:	(R310) NEW PRODUCT;NO	N-FAST TRACK (INCLU	DES REVIEWS	OF PRODUCT CHEMIST
Ingredients:				
	* * * D	ata Package Inf	ormation *	**
Expedite:	e: Yes No Date Sent: 16-May-2008		Due Back:	
DP Ingredient:				
DP Title:	Product Chemistry Review			
	Product Chemistry Review  Yes No Lab	el Included:  Yes	) No Pare	ent DP #:
	Yes No Lab	el Included:  Yes  Date In	No Pare	ent DP #:
CSF Included:	Yes No Lab	Date In		ent DP #: Last Possible Science Due Date: 13-Sep-2008
CSF Included:  Assigned T  Organization: RD / 1	Yes No Lab	Date In		Last Possible Science Due Date: 13-Sep-2008
CSF Included:  Assigned T  Organization: RD / Team Name:	Yes No Lab	Date In		Last Possible Science Due Date: 13-Sep-2008 Science Due Date:

Printed on Page 2

# \* \* \* Additional Data Package for this Decision \* \* \*

No Additional Data Packages

# \* \* \* Data Package Instructions \* \* \*

Please review the attached csfs and labels for this product and the cited product, and the submitted studies (MRIDs 47383701-03), and let me know if they satisfy requirments for registration of this product. Also, please let me know if this product is substantially similar to the cited product for the purpose of citing generic data. Let me know if you need additional information.

Thanks.

Tobi

Page 2

DP#: (352826)	* * * Studies Sent for Review * * *	Decision#: (391538)
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm	830.1550/Product Identity and composition
47383701	Americas, Inc. 153 p. Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1600/Description of materials used to produce the product
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1620/Description of production process
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1670/Discussion of formation of impurities
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1750/Certified limits
47383701	Westmoreland, D. (2007) Triclopyr Technical Butoxyethyl Ester, NUP-07134: Product Identity and Process. Project Number: RTP/07/100/REG. Unpublished study prepared by Nufarm Americas, Inc. 153 p.	830.1800/Enforcement analytical method
47383702	Sheehy, J. (2007) Preliminary Analysis: NUP-07134. Project Number: 23279, P809MS, 071011/7R. Unpublished study prepared by Product Safety Laboratories. 70 p.	830.1700/Preliminary analysis
47383703	Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p.	830.6302/Color
47383703	Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-08146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.6303/Physical state
47383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.6304/Odor
47383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.6313/Stability to sunlight, normal and elevated temperatures, metals, and metal ions
47383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal Ions, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p.	830.7000/pH of water solutions or suspensions
47383703	Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal Ions, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study	830.7050/UV/Visible absorption
47383703	prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p.	830.7220/Boiling point/boiling range
	properties by a roution dentity Laboratories. 80 p.	142

142

\* \* \* Studies Sent for Review \* \* \*

Decision#: (391538)

Union Charles 1/10/05 Citation Reference 47383703 Wo, C. (2007) Physical and Chemical Characteristics: Color, 830.7300/Density/relative density Physical State, Odor, Stability To Normal and Elevated
Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, 47383703 830.7550/Partition coefficient Physical State, Odor, Stability To Normal and Elevated (n-octanol/water), shake flask Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p. Wo, C. (2007) Physical and Chemical Characteristics: Color, Physical State, Odor, Stability To Normal and Elevated 47383703 830.7840/Water solubility: Column elution method, shake flask method Temperature- Metal and metal lons, pH, UV/Visible Absorption, Boiling Point Density/ Relative Density, Partition Coefficient and Water Solubility: Triclopyr BEE Technical (NUP-06146). Project Number: 21818, P804/TGAI, 070322/3R. Unpublished study prepared by Product Safety Laboratories. 93 p.

1/2

(Logo) Dow AgroSciences

# **Triclopyr Butoxyethyl Ester**

For Manufacturing Use Only

**Active Ingredient:** 

triclopyr BEE: (3,5,6-trichloro-2-pyridinyl)

oxyacetic acid, butoxyethyl ester ......96.3%

Acid Equivalent: triclopyr - 69.2%



# CAUTION

# **Precautionary Statements**

Hazards to Humans and Domestic Animals

Causes Moderate Eye Irritation • Harmful if Swallowed • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

## **First Aid**

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**If swallowed:** Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact 1-800-992-5994 for emergency medical treatment information.

# **Environmental Hazards**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## **Directions for Use**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the famulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult Dow AgroSciences for instructions for formulation and other information.

age 2 /2

# Storage and Disposal

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

Pesticide Storage: Store above 28°F or agitate before use.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. **General:** Consult federal, state, or local disposal authorities for approved alternative procedures.

# **Warranty Limitations and Disclaimer**

Dow AgroSciences warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dow AgroSciences EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-87	EPA Est
Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.	
Herbicide	Net Contents

EPA-Accepted: \_\_/\_/\_



42750 - RTU

# Memorandum

Date:	3/31/08
To:	PM 25 , Regulatory Manager
From:	Information Services Branch, ITRMD
indication	ur receipt of this data submission is not an on that MRIDs for the enclosed studies have sted to OPPIN.
from th	e expect that it will be approximately 5 days are above date before the study-level data is
	le in OPPIN.
If y	ou have any questions about this process, contact Teresa Downs (305-5363).



CHEMICAL NO.:

ADMI	NISTRA	TIVE NO(S):	42750 - RTU
N -m			
PM:_	25		

The jacket for this action can be requested through the JACKETS system.

# FEE FOR SERVICE



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 27, 2008

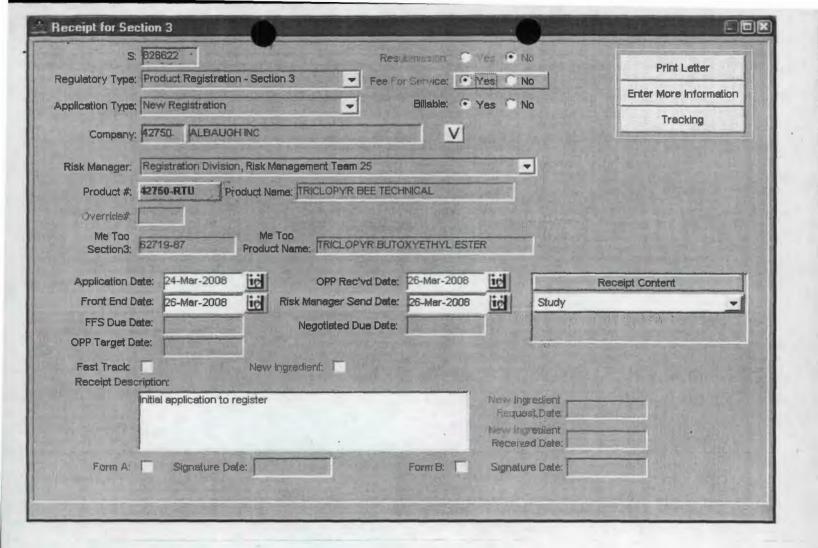
OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

ALBAUGH, INC ALBAUGH INC PO Box 2127 VALDOSTA, GA 31604-2127

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 26-MAR-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



# CORPORATE OFFICE

1525 NE 36th Street Ankeny, IA 50021 515.964.9444 - Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile



473837-00 **Valdosta Office** 

P.O. Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

FEDERAL EXPRESS

March 24, 2008

Mr. Jim Tompkins (PM 25) Registration Division Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 2777 South Crystal Dr. Arlington, VA 22202

RE:

Triclopyr BEE Technical EPA Reg. No. 42750-appl.

Dear Mr. Tompkins,

The enclosed submission is Albaugh's initial application for the above referenced product. Albaugh is submitting this as a "me too" of Dow AgroScience's Triclopyr Butoxyethyl Ester (EPA Reg. No. 62719-87). Albaugh believes this application qualifies as a PRIA II R310 classification with a \$4,360 fee and 6 month review time. The fee payment has been submitted to the EPA lockbox concurrently with this application.

Documents supporting this application are detailed on the enclosed transmittal page.

Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc.

229-244-3288





O

# TRANSMITTAL DOCUMENT

# Name and address of submitter:

Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

Company Official: Morris Gaskins

Telephone: (229) 244-3288

# Regulatory action for which this package is submitted:

Initial application to register Triclopyr BEE Technical

Transmittal Date: March 24, 2008

### List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (5 copies)
- Basic CSF (2 copies)
- PRIA payment check copy
- 47383701 Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method (OPPTS Guidelines 830.1550, 830.1300, 830.1620, 830.1670, 830.1750, and 830.1800) (3 copies)
- 47383702 Series 830-A Preliminary Analysis (OPPTS Guideline 830.1700) (3 copies)
- Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.3303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7220, 830.7300, 830.7550, & 830.7840) (3 copies)

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1525 NE 36th Street Ankeny, IA 50021 515.964.9444 - Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile



473837-00 Valdosta Office

P.O. Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

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JACKETS (Fileroom Document Tracking System)

Requested Jackets Report

(New Requests)

02-Apr-2008

1:43 PM

Woodley, Jonnie

Requested by:

Colvin-Snyder, Tobi

Agency: EPA Office: OPPTS Program: OPP

Division: RD Branch: HB

Requested on

02-Apr-2008 at 01:57 PM

Barcode:

20856

Page 1 of 1

Group Num: 150167

Jacket Regulatory

Barcode Case File #

Vol/Tot

Location

Status

9278755 42750-RTU

1/1

File Rm: 67 / A / 01 / 1

Under Review (26-Mar-2008)

Total # of jackets requested:

1

Completed:

JW

Date: 2-APR.05

Time: 13:54

To the Document Center (ITRMD)

\*Please transfer jacket /mini-jacket to Product
Manager Team circled below:

Minor Use Section PM-5

Insecticide Branch PM-10 PM-13

Herbicide Branch PM-23 PM-25

Fungicide Branch PM-21 PM-22

Insect /Rodent Br. PM-1 PM-7

\*Reminder to PM - If applicable pick-up of

\*Reminder to PM – If applicable pick-up data from Screening Room.

Processed by RD's Completeness Check Team

(Team Member Signature) (Date)

PAA – 21 Day Content Screening Checklist

Experts In-Processing Signature: Gull Fee Paid: Yes No\_

	Reg. Number: 42 750 - PAU EPA Receipt Date: 3/26	Yes	No	NA
1	Application Form (EPA Form 8570-1)—signed & complete including package type?	V		
2	Confidential Statement of Formula (EPA Form 8570-29)	/		
	a) Is the CSF completely filled out (Boxes 1-21)? Does it add up to 100%			٠
	b) After the inerts list is on the web, are all inerts cleared for food and non food proposed uses?			
	c) CAS # provided?			
3	Certification with Respect to Citation of Data (EPA Form 8570-34)? [Applicable, if submission is not a 100% repack]	/		
4	Formulator's Exemption Statement (EPA Form 8570-27)?			1
	a) Formulator's Exemption Statement was not addressed because registrant owns/formulates the source of active ingredient in product formulation,			
	b) if so, was a generic data matrix included?		1	
5	Data Matrix (EPA Form 8570-35) [Applicable, if submission is not a 100% repack]	/		
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay	·		
	c) Public copy of Matrix provided? See PR Notice 98-5		/	
6	Is Label Included? (5 copies)	/		
7	Letter of Authorization for exclusive use only?			
8	Required Data and or data waivers submitted?			
	a) Which study(s) is missing? List them below			
9	CRP Certification Statement			/
10	86-5 Rejection List?			/
11	Notice of Filing included with petitions?			~
	Comments: Won Food			



# NITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 27, 2008

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-391538

EPA File Symbol or Registration Number: 42750-RTU Product Name: TRICLOPYR BEE TECHNICAL

EPA Receipt Date: 26-Mar-2008 EPA Company Number: 42750 Company Name: ALBAUGH INC

MORRIS GASKINS ALBAUGH, INC ALBAUGH INC PO Box 2127 VALDOSTA, GA 31604-2127

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310

NEW PRODUCT; NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY; ACUTE TOXICITY; PUBLIC HEALTH PEST EFFICACY);

No additional payment is due at this time.

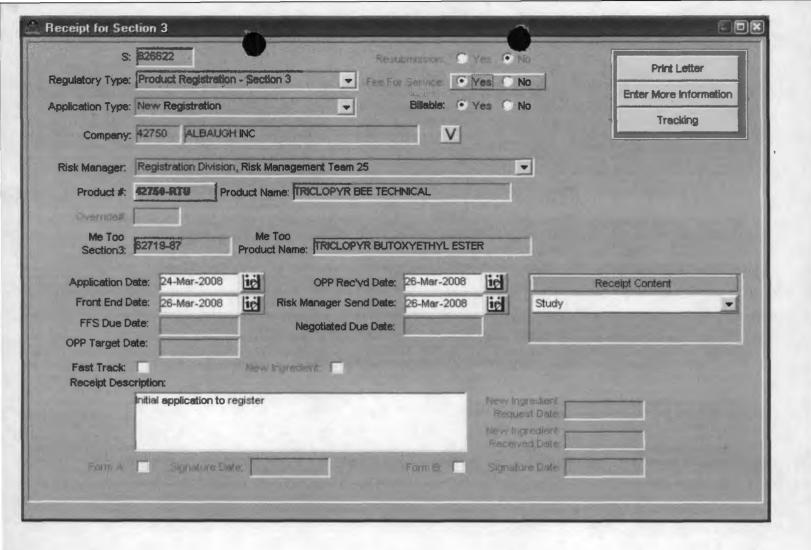
If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,

Front End Processing Staff

Peresa Vouns

Information Technology & Resources Management Division



# FEE FOR SERVICE

Albaugh Inc. 1525 N.E. 36th St. Ankeny, Iowa 50021

US BANK ST. LOUIS, MO 63101 MEMPHIS BANKING CENTER 80-1769(3)

64004

Four thousand three hundred sixty and xx / 100 Dollars

DATE

**AMOUNT** 

3/20/2008

\*\*\*\*4.360.00

PAY TO THE ORDER OF:

**ENVIRONMENTAL PROTECTION AGENCY** 

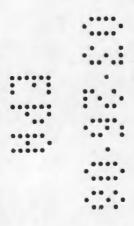
USA

10640041

Albaugh Inc.

64004

INVOICE	1545 REFERENCE	INV. DATE	INV. AMOUNT	DISCOUNT	ADJ. AMT.	AMT. PAID
TRICLOF		3/20/2008	4,360.00	0.00		4,360.0
	PRIA	fee for	Triclopyr B	EE Technical	Ablication	
	Subm	19ted 3/:	14/08			
		TOTALS:	4,360.00	0.00		4,360.0



rm Approved.	B No. 2	070-0060.	Approval	expires	2-28-9



# **United States**

✓	Registration
	Amendment
	Other

OPP Identifier Number

<b>EPA</b> Environ	mental Protection Age Washington, DC 20460	ency	Amendmen Other	nt		
622	Application for	Pesticide - Section	1			
1. Company/Product Number 42750-appl: アゴロ		2. EPA Product Manager J. Tompkins		3. Proposed Classification		
4. Company/Product (Name) Triclopyr BEE Technical		PM# 25				
5. Name and Address of Applicant (Inclu Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127 Check if this is a new ed	6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No.  62719-87  Product Name  Triclopyr Butoxyethyl Ester					
	Sec	ction - II				
Amendment - Explain below.  Resubmission in response to Age  Notification - Explain below.	ncy letter dated	Final printed labe Agency letter det  Me Too" Applic	ted ation.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Initial application to register  This application is being submitted under the PRIA II Fee for Service program as a EPA Class # R310 application with a 6 month review time and a fee of \$4,360.  Albaugh check # 64004 for that amount has been submitted to the EPA lockbox concurrently with this application.						
	Sec	tion - III				
1. Material This Product Will Be Package						
Child-Resistant Packaging  Yes  ✓ No  If "Yes"  No. per  If "Yes"  No. per		Yes  No  No. per oge wgt container  2. Type of Container  Metal Plastic Glass Paper Other (Specify)		tal stic ss ser		
3. Location of Net Contents Information	4. Size(s) Retail Conta	5. Lo	On label attac	rections ched to container		
6. Manner in Which Label is Affixed to P	roduct Uthograph Paper glued Stenciled	Other				
	Sec	tion - IV		****		
1. Contact Point (Complete items direct	y below for identification of indi-	vidual to be contacted, if nec	essary, to process	this application.)		
Name Morris Gaskins	Title Registra	ations Manager		ohone No. Unclude Area Code) 244-3288		
I certify that the statements I have i acknowledge that any knowlinght both under applicable law.				6. Date Application Received . (Stamped)		
2. Signature	3. Title Registra	ations Manager				
4. Typed Name	5. Date			•••		
Morris Gaskins	March 24, 2008					

### **CORPORATE OFFICE**

1525 NE 36th Street Ankeny, IA 5002 t 515.964.9444 Office 800.247.8013 - Toll Free 515.964.7813 - Facsimile



**Valdosta Office** 

P.O. Box 2127 304 Janet Street, Suite H Valdosta, GA 31604 229.244.3288 - Office 229.244.5841 - Facsimile

FEDERAL EXPRESS

March 24, 2008

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Please call if you have any questions.

Regards,

Morris Gaskins

Registrations Manager

Albaugh, Inc. 229-244-3288

# TRANSMITTAL DOCUMENT

# Name and address of submitter:

Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604-2127

Company Official: Morris Gaskins

**Telephone:** (229) 244-3288

# Regulatory action for which this package is submitted:

Initial application to register Triclopyr BEE Technical

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- Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.3303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7220, 830.7300, 830.7550, & 830.7840) (3 copies)



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Do not send the completed form to this address.

Do not send the completed form to this address.	7 111 041001, 0.001, 10	asimigran, 50 20 100.		
Certification with Respec	t to Citation of	Data		
Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604		EPA Registration Number/File Symbol 42750-appl		
Active Ingredient(s) and/or representative test compound(s) triclopyr butoxyethyl ester		Date 3/24/08		
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 terrestrial food use, terrestrial non-food use	9)	Product Name Triclopyr BEE Technical		
NOTE: If your product is a 100% repackaging of another purchased EPA-registers submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator's Exemption Statement)		or all the same uses on your label, you do not need to		
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	ent offers of compensation (the Data Matrix form should		
SECTION I: METHOD OF DATA SUPP	PORT (Check one m	ethod only)		
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).  I am using the selective method of support (or cite-all or under the selective method), and have included with this completed list of data requirements (the Data Matrix for used).				
SECTION II: GENERAL	OFFER TO PAY			
SECTION III: CERT	TFICATION			
I certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Call-In response. In Indicated in Section I, this application is supported by all data in the Agency's files that stantially similar product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application sougues.	addition, if the cite- it (1) concern the pro is a type of data tha	all option or cite-all option under the selective method is operties or effects of this product or an identical or twould be required to be submitted under the data		
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, th	at I am the original data submitter or that I have obtained		
I certify that for each study cited in support of this registration or reregistrati submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public literature; or (e) offered (l) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(amount and terms of compensation, if any, to be paid for the use of the study.	study in support of the large study in support of the large support of the large study in the large study in support of the la	his application; (c) all periods of eligibility for iting the company that submitted the study and have		
I certify that in all instances where an offer of compensation is required, copaccordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will levidence to the Agency upon request, I understand that the Agency may initiate action FIFRA.  I certify that the statements I have made on this form and all attachments who wingly false or misleading statement may be punishable by fine or imprisonal.	be submitted to the and to deny, cancel or ments to it are true,	Agency upon request. Should I fail to produce such suspend the registration of my productin conformity with accurate, and configures. I acknowledge that any fer applicable laws		
Signature May Des	Date Mar 24, 2008	Typed or Printed Name and Title  Morris Gaskins Registrations Manager		

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	DA	TA MATRIX				
Date: 3/24/08		EPA Reg. No./File Symbol	42750-appl	Page 1 of 5		
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021  Ingredient: Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7			Product TRICLOPYR BEE TECHNICAL			
Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.1550	Product Identity and Composition	With application	Albaugh	OWN		
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN		
830.1620	Description of Production Process	With application	Albaugh	OWN		
830.1650	Description of Formulation Process				Waiver <sup>2</sup>	
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN		
830.1700	Preliminary Analysis	With application	Albaugh	OWN		
830.1750	Certified Limits	With application	Albaugh	OWN		
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN		
830.6302	Color	With application	Albaugh	OWN		
830.6303	Physical State	With application	Albaugh	OWN		
830.6304	Odor	With application	Albaugh	OWN		
830.6313	Stability to Normal and Elevated Temperatures,  Metals, and Metal Ions	With application	Albaugh	OWN		
830.6314					Not req'd1	
830.6315	** Flammability				Not req'd1	
830.6316	Explodability				Not req'd1	
830.6317	Storage Stability				Not req'd1	
Signature	M-2/2/8		Name and Title: Morris Ga Registrati	skins ons Manager	Date: 3/24/08	

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DATA MATRIX						
Date: 3/24/08		EPA Reg. No./File Symbol 42750-appl Page 2 of 5				
Applicant's/Registrant's Name & Address:	Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021	Product: TRICLOPYR BEE TECHNICAL				
	CAC # C4700 FC 7					

**Ingredient:** Triclopyr butoxyethyl ester (BEE) CAS # 64700-56-7 **Guideline Reference Number Guideline Study Name MRID Number Submitter Status** Note Not reg'd1 830.6319 Miscibility Not rea'd1 830.6320 Corrosion Characteristics 830.6321 Not reg'd<sup>1</sup> Dielectric Breakdown Voltage 830.7000 pН With application Albaugh OWN 830,7050 **UV/Visible Absorption** With application Albaugh OWN 830.7100 Viscosity Not rea'd1 Waiver<sup>3</sup> 830,7200 Meltina Point/Meltina Range With application OWN 830,7220 Boiling Point/Boiling Range Albauah 830.7300 Density/Relative Density/Bulk Density With application Albaugh **OWN** Waiver<sup>4</sup> 830.7370 Dissociation Constants in Water Partition Coefficient (n-octanol/water), Shake With application OWN 830.7550 Albaugh Flask Method Partition Coefficient (n-octanol/water), 830.7560 Waiver<sup>5</sup> Generator Column Method Partition Coefficient (n-octanol/water), Waiver<sup>5</sup> 830.7570 Estimation by Liquid Chromatography Signature Name and Title: Morris Gaskins Date: 3/24/08 Registrations Manager

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DATA MATRIX

Date: 2/24/00

Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021			EPA Reg. No./File Symbol 42750-appl		Page 3 of 5	
			Product: TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyeth	nyl ester (BEE) CAS # 64700-56-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	With application	Albaugh	OWN		
830.7860	Water Solubility, Generator Column Method				Waiver <sup>6</sup>	
830.7950	Vapor Pressure				Not req'd <sup>1</sup>	
870.1100	Acute Oral Toxicity – Rat	CITE ALL		PAY		
870.1200	Acute Dermal Toxicity - Rat	CITE ALL		PAY		
870.1300	Acute Inhalation Toxicity - Rat	CITE ALL		PAY		
870.2400	Primary Eye Irritation - Rabbit	CITE ALL		PAY		
870.2500	Primary Dermal Irritation	CITE ALL		PAY		
870.2600	Dermal Sensitization	CITE ALL		PAY		
Signature		NP	Name and Title: Morris Gaskins Registrations Ma	nager	Date: 3/24/08	
EPA Form 8570-35 (9-97) Electronic	and Paper versions available. Submit only paper vers	ion.	Registrations Ma		3/24/08	

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	DAT	A MATRIX			
Date: 3/24/08  Applicant's/Registrant's Name & Address:  Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021			EPA Reg. No./File Symbol 42750-appl		Page 4 of 5
			Product: TRICLOPYR BEE TECHNICAL		
Ingredient: Triclopyr butoxyethyl					
Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr generic data requirer					
Albaugh will make offers-to-pay to of March 21, 2008	the following companies that appear on the	current data subn	nitters list for Triclopyr Butoxyethyl Ester as		
Triclopyr BEE data	Cite-All		Nufarm Americas (228)	PAY	
Triclopyr BEE data	Cite-All		Lebanon Seaboard (961)	PAY	
Triclopyr BEE data	Cite-All		BASF Sparks (51036)	PAY	
Triclopyr BEE data	Cite-All		Dow Agroscience (62719)	PAY	
Triclopyr BEE data	Cite-All		SDTF (66607)	PAY	
Triclopyr BEE data	Cite-All		Repar Corp (69361)	PAY	
Triclopyr BEE data	Cite-All		United Phosphorous (70506)	PAY	
Triclopyr BEE data	Cite-All		ORETF (71754)	PAY	
Triclopyr BEE data	Cite-All		Ag Re-Entry Task Force (71755)	PAY	
Triclopyr BEE data	Cite-All		Nations Ag II (72167)	PAY	
Triclopyr BEE data	Cite-All		Endangered Species TF (73989)	PAY	
Triclopyr BEE data	Cite-All		Residential Exposure JV (74888)	PAY	
Triclopyr BEE data	Cite-Al.		AHETF (75234)	PAY	
	* * *				
Signature	<b>A</b>	Ja.	Name and Title: Morris Gaskins Registrations Manager	J	Date: 3/24/08

# Footnotes for Triclopyr BEE Technical Data Matrix Page 5 of 5

### Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6315 Flammability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830.6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830,7100 Viscosity
- 830.7950 Vapor Pressure

This data is not required for technical products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

### Footnote 2

830.1650 Formulation Process. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not formulated. See Guideline 830.1620.

### Footnote 3

830.7200 Melting Point. Because triclopyr ester is a liquid product this guideline is not appropriate and Albaugh requests a waiver for this data requirement.

#### Footnote 4

830,7370 Dissociation Constant in Water.

Dissociation constant is used to measure the dissociation potential of strong acids and bases in the environment. An evaluation of the triclopyr ester molecular structure and its neutral pH value indicates that it will not dissociate. An exhaustive public literature search reveals no pKa value is given for triclopyr butoxyethyl ester. According to The Pesticide Manual, Eleventh Edition, page xix, "where no pKa value is given, it may indicate that no significant dissociation occurs in the environmental range; values of pKa for bases and pKa >8 for acids are not relevant in an environmental context". Since Triclopyr Butoxyethyl ester is not a storng acid or base and does not contain any acid functional group Albaugh requests a waiver for this data requirement.



### Footnote 5

- 830.7570 Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography. See Guideline 830.7550.



- 830.7860 Water Solubility, Generator Column Method. See guideline 830.7840.

Form Approved OMB No. 2070-0060

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, DC 20460

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	DATA MA	TRIX
Date: 3/24/08		EPA Reg. No./File Symbol 42750-appl Page 1 of 5
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021		Product TRICLOPYR BEE TECHNICAL
Ingredient: Triclopyr butoxyethyl ester (BEE)	CAS # 64700-56-7	

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver <sup>2</sup>
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd1
					Not req'd1
					Not req'd1
					Not req'd1
gnature ••••••••••••••••••••••••••••••••••••	Mag Des		Name and Title: Morris Gaskins Registrations Manager		Date: 3/24/08

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DATA MATRIX

Date: 3/24/08		EPA Reg. No./File Symbol 42750-appl		Page 2 of 5	
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021			Product: TRICLOPYR BEE TECHNICAL		
<b>Ingredient:</b> Triclopyr butoxyeth	yl ester (BEE) CAS # 64700-56-7				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Not req'd1
					Not req'd1
					Not req'd1
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd1
					Waiver <sup>3</sup>
			Albaugh	OWN	
			Albaugh	OWN	
			-		Waiver⁴
			Albaugh	OWN	
					Waiver <sup>5</sup>
					Waiver <sup>5</sup>
Signature		A P	Name and Title: Morris Gas Registratio	kins ns Manager	Date: 3/24/08

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DATA MATRIX

Date: 2/24/09

Date: 3/24/08			EPA Reg. No./File Symbol 42750-appl		Page 3 of 5	
Applicant's/Registrant's Name & Address:  Albaugh Inc.  121 NE 18 <sup>th</sup> St.  Ankeny, IA 50021			Product: TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyeth	yl ester (BEE)	CAS # 64700-56-7				
Guideline Reference Number	Guideline S	Study Name	MRID Number	Submitter	Status	Note
				Albaugh	OWN	
						Waiver <sup>6</sup>
						Not req'd1
					PAY	
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					PAY	
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signature			NB.	Name and Title: Morris Gaskins Registrations M	anager	Date: 3/24/08
PA Form 8570-35 (9-97) Electronic	and Paper versi	ons available. Submit only paper	version.	Agency Public U	Jse Copy	<del> </del>

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		D	ATA MATRIX			
Date: 3/24/08  Applicant's/Registrant's Name & Address:  Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021			EPA Reg. No./File Symbol 42750-appl		Page 4 of 5	
			Product: TRICLOPYR BEE TECHNICAL			
Ingredient: Triclopyr butoxyeth	yl ester (BEE)					
Guideline Reference Number	Guideline S	tudy Name	MRID	Submitter (EPA Co. No.)	Status	Note
Triclopyr generic data require	ements					
Albaugh will make offers-to-pay of March 21, 2008	to the followin	g companies that appear on th	ne current data subm	nitters list for Triclopyr Butoxyethyl Ester as		
				Nufarm Americas (228)	PAY	
				Lebanon Seaboard (961)	PAY	
				BASF Sparks (51036)	PAY	
				Dow Agroscience (62719)	PAY	
				SDTF (66607)	PAY	
				Repar Corp (69361)	PAY	
				United Phosphorous (70506)	PAY	•
				ORETF (71754)	PAY	
				Ag Re-Entry Task Force (71755)	PAY	
				Nations Ag II (72167)	PAY	
				Endangered Species TF (73989)	PAY	
				Residential Exposure JV (74888)	PAY	
				AHETF (75234)	PAY	
•••••	:					
Signature	•		orp	Name and Title: Morris Gaskins Registrations Manager		Date: 3/24/08

## Footnotes for Triclopyr BEE Technical Data Matrix Page 5 of 5

#### Footnote 1

- 830.6314 Oxidation/Reduction: chemical incompatibility
- 830.6315 Flammability
- 830.6316 Explodability
- 830.6315 Flammability
- 830.6317 Storage Stability
- 830.6319 Miscibility
- 830,6320 Corrosion Characteristics
- 830.6321 Dielectric Breakdown
- 830.7100 Viscosity
- 830.7950 Vapor Pressure

This data is not required for technical products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

### Footnote 2

830.1650 Formulation Process. Albaugh requests a waiver for this data requirement. Triclopyr BEE Technical is not formulated. See Guideline 830.1620.

### Footnote 3

830.7200 Melting Point. Because triclopyr ester is a liquid product this guideline is not appropriate and Albaugh requests a waiver for this data requirement.

#### Footnote 4

830.7370 Dissociation Constant in Water.

Dissociation constant is used to measure the dissociation potential of strong acids and bases in the environment. An evaluation of the triclopyr ester molecular structure and its neutral pH value indicates that it will not dissociate. An exhaustive public literature search reveals no pKa value is given for triclopyr butoxyethyl ester. According to The Pesticide Manual, Eleventh Edition, page xix, "where no pKa value is given, it may indicate that no significant dissociation occurs in the environmental range; values of pK for bases and pKa >8 for acids are not relevant in an environmental context". Since Triclopyr Butoxyethyl ester is not a storng acid or base and does not contain any acid functional group Albaugh reguests a waiver for this data requirement.



### Footnote 5

- 830.7570 Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography. See Guideline 830.7550.



- 830.7860 Water Solubility, Generator Column Method. See guideline 830.7840.

## TRICLOPYR BEE TECHNICAL

### For Manufacturing Use Only

ACT	IVE	INGI	RED]	ENT	

\*Acid Equivalent: triclopyr - 70.4%

### CAUTION

#### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatment; formation.

### PRECAUTIONARY STATEMENTS

# HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 42750-xxx

EPA Est. No. xxxxxx-xxx-xxx

**NET CONTENTS:** 

MANUFACTURED FOR: Albaugh, Inc. Ankeny, IA 50021

### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 32°F or agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, of puncture and dispose of in a sanitary landfill, or by other procedures approved by the state and local authorities.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

# TRICLOPYR BEE TECHNICAL

# For Manufacturing Use Only

ACTI	VE.	ING	RED	IEN	IT:

### CAUTION

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatments formation.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 42750-xxx

EPA Est. No. xxxxxx-xxx-xxx

**NET CONTENTS:** 

MANUFACTURED FOR: Albaugh, Inc. Ankeny, IA 50021

<sup>\*</sup>Acid Equivalent: triclopyr - 70.4%

### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 32°F or agitate before use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, of puncture and dispose of in a sanitary landfill, or by other procedures approved by the state and local authorities.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

### WARRANTY LIMITATIONS AND DISCLAIMER

Albaugh, Inc. warrants that at the time of delivery, the good will conform to its chemical description on the label, that they will pass without objection in the trade under the contract description, that they will be reasonably fit for the uses stated on the label when used in accordance with directions, that Seller will convey good title thereto, and that such goods will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. ALBAUGH, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTEES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the goods and does not rely exclusively on any oral or written statements or representations.

# TRICLOPYR BEE TECHNICAL

## For Manufacturing Use Only

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\*Acid Equivalent: triclopyr - 70.4%

### **CAUTION**

### FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Contract CHEMTREC at 1-800-424-9300 for transport or emergency medical treatment information.

### PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Causes moderate eye irritation. Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 42750-xxx

EPA Est. No. xxxxxx-xxx-xxx

**NET CONTENTS:** 

MANUFACTURED FOR: Albaugh, Inc. Ankeny, IA 50021

### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For quidance, contact your State Water Board or Regional Office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turf; non-irrigation ditchbanks, and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with the U.S. EPA submission requirements regarding the support of such use(s). Consult Albaugh, Inc. for instructions for formulation and other information.

### STORAGE AND DISPOSAL

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# ISB'S Front-end PRIA Completeness Screen Draft 3; 10/25/07

EPA Receipt DateMAR 2 6 2008 EPA Reg. Number:			427	42750_RTU		
	Check List Item		Yes	No	N/A	
1	Has the PRIA Fee been Paid; is a copy of the check or Pay.gov receipt included in the Submission Package?		X			
2	Is an Application Form (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?		×			
3	Is a Confidential Statement of Formula (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?		X			
4	Is a Formulator's Exemption Statement (EPA Form 8570-27) Included in the Submission Package?			χ		
5	Is a Certification with Respect to Citation of Data (EPA Form 8570-34) Included in the Submission Package?		X			
6	Is a <b>Data Matrix</b> (EPA Form 8570-35) Included in the Submission Package?		X			
7	Is a Label Included in the Submission	Package?	X			
8	Are Data Included in the Submission	Package?	X			
9	Is the Submission an Amendment?			X		